
Appendix B
Comments Received on the Desert Southwest
Transmission Project NOP and NOI



UNITED STATES MARINE CORPS
MARINE CORPS AIR STATION
BOX 99100
YUMA, ARIZONA 85369-9100

LETTER "A"

11000 IN REPLY REFER TO:
CP&L/IIDSWTP
August 21, 2002

Michel D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
P. O. Box 937
Imperial, CA 92251

Dear Mr. Remington:

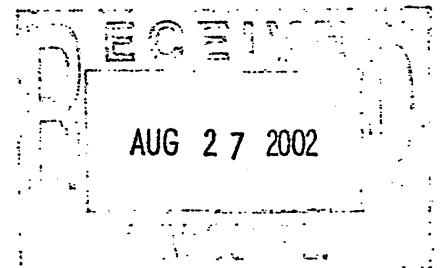
We are in receipt of the Notice of Preparation for Imperial Irrigation District Desert Southwest Transmission Project. The project is to construct, operate, and maintain a new transmission line from a new substation/switching station, west of the Blythe Power Plant, for a distance of approximately 118 miles, to Southern California Edison's Devers Substation, about 10 miles north of Palm Springs, CA. We offer the following comments.

The new transmission line will run parallel to Interstate 10 and is outside the Chocolate Mountain Aerial Gunnery Range. The Marine Corps Air Station has reviewed the project and we do not have any comments at this time.

Thank you for the opportunity to comment.

Sincerely,

T. A. MANFREDI
Community Planner
By direction of the
Commanding Officer





Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse

LETTER "B"



Tal Finney
INTERIM DIRECTOR



Notice of Preparation

August 1, 2002

AUG - 6 2002

To: Reviewing Agencies

Re: Imperial Irrigation District New 230 kV "BN-BS" Transmission Line
SCH# 2001041105

Attached for your review and comment is the Notice of Preparation (NOP) for the Imperial Irrigation District New 230 kV "BN-BS" Transmission Line draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Michael D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
P.O. Box 937
Imperial, CA 92251

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Becky Frank
for:

Scott Morgan
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
916-445-0613 FAX 916-323-3018 www.opr.ca.gov



**Document Details Report
State Clearinghouse Data Base**

SCH# 2001041105
Project Title Imperial Irrigation District New 230 kV "BN-BS" Transmission Line
Lead Agency Imperial Irrigation District

Type NOP Notice of Preparation

Description The IID and the U.S. Department of the Interior, Bureau of Land Management (BLM) are preparing to assess the environmental effects of constructing, operating, and maintaining a new, approximately 118 mile long, transmission line from a new substation/switching station located on the north side of Hobsonway, west of the Blythe Power Plant, approximately 4.5 miles west of Blythe, California, to Southern California Edison's Devers Substation, approximately 10 miles north of Palm Springs. The proposed project will operate at either 230-kV or 500-kV and will provide increased transmission line capabilities from the proposed new substation/switching station on Hobsonway to the Devers Substation to meet transmission requests.

Lead Agency Contact

Name Michael D. Remington
Agency Imperial Irrigation District
Phone 760/482-9831 **Fax** 760/482-9896
email mdremington@iid.com
Address 333 East Barioni Boulevard
P.O. Box 937
City Imperial **State** CA **Zip** 92251

Project Location

County Riverside
City Blythe
Region
Cross Streets
Parcel No.
Township

Range

Section

Base

Proximity to:

Highways
Airports
Railways
Waterways East Highline Canal/Coachella Canal
Schools
Land Use

Project Issues Noise; Air Quality; Biological Resources; Aesthetic/Visual; Landuse; Economics/Jobs; Public Services; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Forestry and Fire Protection; Office of Historic Preservation; Department of Parks and Recreation; Department of Fish and Game, Region 5; Department of Fish and Game, Region 6; California Energy Commission; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Caltrans, District 8; California Highway Patrol; Regional Water Quality Control Board, Region 7; Caltrans, District 11

Date Received 08/01/2002 **Start of Review** 08/01/2002 **End of Review** 08/30/2002

Resources Agency

☒ Resources Agency
Nadell Gayou

☒ Dept. of Boating & Waterways
Bill Curry

☒ California Coastal
Commission
Elizabeth A. Fuchs

☒ Dept. of Conservation
Roseanne Taylor

☒ Dept. of Forestry & Fire
Protection
Allen Robertson

☒ Office of Historic
Preservation
Hans Kreutzberg

☒ Dept of Parks & Recreation
B. Noah Tighman

☒ Environmental Stewardship
Section

☒ Reclamation Board
Pam Bruner

☒ S.F. Bay Conservation &
Dev't. Comm.
Steve McAdam

☒ Dept. of Water Resources
Agency
Nadell Gayou

☒ Health & Welfare

☒ Health & Welfare
Wayne Hubbard

☒ Dept. of Health/Drinking Water

☒ Food & Agriculture

☒ Food & Agriculture
Steve Shaffer

☒ Dept. of Food and Agriculture

Fish and Game

☒ Dept. of Fish & Game
Scott Flint

☒ Environmental Services Division

☒ Dept. of Fish & Game 1
Donald Koch

☒ Region 1

☒ Dept. of Fish & Game 2
Banky Curtis

☒ Region 2

☒ Dept. of Fish & Game 3
Robert Floerke

☒ Region 3

☒ Dept. of Fish & Game 4
William Laudemilk

☒ Region 4

☒ Dept. of Fish & Game 5
Don Chadwick

☒ Region 5, Habitat Conservation
Program

☒ Dept. of Fish & Game 6
Gabrina Gatchel

☒ Region 6, Habitat Conservation
Program

☒ Dept. of Fish & Game 6 I/M
Tammy Allen

☒ Region 6, Inyo/Mono, Habitat
Conservation Program

☒ Dept. of Fish & Game M
Tom Napoli

☒ Marine Region

Independent Commissions

☒ California Energy Commission
Environmental Office

☒ Native American Heritage
Comm.

☒ Debbie Treadway

☒ Public Utilities Commission
Ken Lewis

☒ State Lands Commission
Betty Silva

☒ Governor's Office of Planning
& Research

☒ State Clearinghouse Planner

☒ Colorado River Board
Gerald R. Zimmerman

☒ Tahoe Regional Planning
Agency (TRPA)
Lyn Barnett

☒ Office of Emergency Services
John Rowden, Manager

☒ Delta Protection Commission
Debby Eddy

☒ Santa Monica Mountains
Conservancy
Paul Edelman

☒ Dept. of Transportation

☒ Dept. of Transportation 1
Mike Eagan

☒ District 1

☒ Dept. of Transportation 2
Don Anderson

☒ District 2

☒ Dept. of Transportation 3
Jeff Pulverman

☒ District 3

☒ Dept. of Transportation 4
Jean Finney

☒ District 4

☒ Dept. of Transportation 5
David Murray

☒ District 5

☒ Dept. of Transportation 6
Marc Blimbaum

☒ District 6

☒ Dept. of Transportation 7
Stephen J. Buswell

☒ District 7

☒ Dept. of Transportation 8
Linda Grimes,

☒ District 8

☒ Dept. of Transportation 9
Katy Walton

☒ District 9

☒ Dept. of Transportation 10
Tom Dumas

☒ District 10

☒ Dept. of Transportation 11
Bill Figge

☒ District 11

☒ Dept. of Transportation 12
Bob Joseph

☒ District 12

☒ Business, Trans. & Housing

☒ Housing & Community Development
Cathy Creswell

☒ Housing Policy Division

☒ Caltrans - Division of Aeronautics
Sandy Hesnard

☒ California Highway Patrol
Lt. Julie Page

☒ Office of Special Projects

☒ Dept. of Transportation
Ron Helgeson

☒ Caltrans - Planning

☒ Dept. of General Services
Robert Steppy

☒ Environmental Services Section

☒ Air Resources Board

☒ Airport Projects
Jim Lerner

☒ Transportation Projects
Kurt Karperos

☒ Industrial Projects
Mike Tollstrup

☒ California Integrated Waste
Management Board

☒ Sue O'Leary

☒ State Water Resources Control
Board

☒ Diane Edwards

☒ State Water Resources Control
Board

☒ Greg Frantz

☒ Division of Water Quality

☒ State Water Resources Control
Board

☒ Mike Falkenstein

☒ Division of Water Rights

☒ Dept. of Toxic Substances Control
CEQA Tracking Center

☒ Regional Water Quality Control
Board (RWQCB)

☒ RWQCB 1

☒ Cathleen Hudson

☒ North Coast Region (1)

☒ RWQCB 2

☒ Environmental Document
Coordinator

☒ San Francisco Bay Region (2)

☒ RWQCB 3

☒ Central Coast Region (3)

☒ RWQCB 4

☒ Jonathan Bishop

☒ Los Angeles Region (4)

☒ RWQCB 5S

☒ Central Valley Region (5)

☒ RWQCB 5F

☒ Central Valley Region (5)

☒ Fresno Branch Office

☒ RWQCB 5R

☒ Central Valley Region (5)

☒ Redding Branch Office

☒ RWQCB 6

☒ Lahontan Region (6)

☒ RWQCB 6V

☒ Lahontan Region (6)

☒ Victorville Branch Office

☒ RWQCB 7

☒ Colorado River Basin Region (7)

☒ RWQCB 8

☒ Santa Ana Region (8)

☒ RWQCB 9

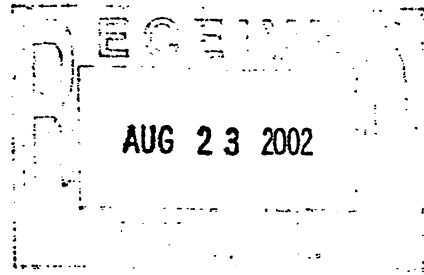
☒ San Diego Region (9)

STATE OF CALIFORNIA - THE RESOURCES AGENCY

DEPARTMENT OF FISH AND GAME

Eastern Sierra & Inland Deserts Region
4775 Bird Farm Rd.
Chino Hills, CA 91709
(909) 597-5043

GRAY DAVIS, Gov



20 August, 2002

Mr. Michel D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
P.O. Box 937
Imperial, CA 92251

Dear Mr. Remington:

**Notice of Preparation of an
Environmental Impact Report/Environmental Impact Statement (EIR/EIS)
for the Desert Southwest Transmission Project
SCH# 2001041105**

The Department of Fish and Game (Department) appreciates this opportunity to comment on the above-referenced project, relative to impacts to biological resources. To enable Department staff to adequately review and comment on the proposed project, we recommend the following information be included in any environmental document prepared for the proposed project:

1. A complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats.
 - a) A thorough assessment of rare plants and rare natural communities, following the Department's May 1984 Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities. Please delineate vegetation communities (acreage and distribution) within and adjacent to proposed transmission line route to the finest spatial scale possible and classify those communities according to Sawyer & Keeler-Wolfe. Please collaborate with the Department prior to conducting botanical surveys.

- b) A complete assessment of sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service. Please evaluate direct and indirect effects of the project to desert mule deer and Nelson's bighorn sheep.
- c) Rare, threatened, and endangered species to be addressed should include all those which meet the California Environmental Quality Act (CEQA) definition (see CEQA Guidelines, §15380). Species to be surveyed should include, but not necessarily limited to: California leaf-nosed bat, cave myotis, Pale big-eared bat, Pallid bat, Western mastiff bat, Coachella Valley round-tailed ground squirrel, Palm Springs pocket mouse, Gila woodpecker, gilded flicker, crissal thrasher, Le Conte's thrasher, mountain plover, western burrowing owl, elf owl, vermilion flycatcher, brown-crested flycatcher, Loggerhead shrike, Sonoran yellow warbler, desert tortoise, flat-tailed horned lizard, Coachella Valley fringe-toed lizard, Colorado Desert fringe-toed lizard, Mojave fringe-toed lizard, Couch's spade-foot toad, red diamond rattlesnake.
- d) Potential direct and indirect effects to raptors and songbirds which would be locally and regionally significant. The Department recommends detailed focused surveys be conducted so an evaluation of the projects impacts can be made. Upon completion of the focused survey, appropriate mitigation measures can be developed to ensure the long term protection of vital habitats for the sensitive species occurring on the site. Mitigation measures may require avoidance of particularly sensitive habitats and, therefore, require a redesign of the project.
- e) Agricultural, grassland, Sonoran creosote bush scrub, desert dry wash woodland, and wetland habitats are of seasonal importance to several Special Status Species of raptors that may be observed during both the spring and winter months. These habitat communities provide important, if not vital, staging and wintering habitats. Other annual resident raptors may forage or nest in these habitats. Please conduct an impact analysis on both resident and migratory raptors resulting from effects of the project.
- f) The Department's California Natural Diversity Data Base in Sacramento

should be contacted at (916) 324-3812 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

- g) The Department is unable to authorize incidental take of "fully protected" species (Fish and Game Code Sections 3511, 4700, 5050, and 5515) when activities are proposed in areas inhabited by those species. In addition, Fish and Game Code Section 3513 prohibits any take or possession of birds that are designated by the Migratory Bird Treaty Act (MBTA) as migratory nongame birds except as allowed by federal rules and regulations promulgated pursuant to the MBTA. The Department is similarly unable to authorize the incidental take of five types of birds listed under Fish and Game Code Section 3505, or the incidental take of unlisted raptors or the destruction of their nests or eggs (Fish and Game Code Section 3503.5). Early consultation with the Department is strongly suggested in developing appropriate minimization and avoidance measures to ensure avoidance of direct and indirect effects to nesting birds.

- 2. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts.

- a) CEQA Guidelines, §15125(a), direct that knowledge of the regional setting is critical to an assessment of environmental impacts and that special emphasis should be placed on resources that are rare or unique to the region.
- b) Project impacts should be analyzed relative to their effects on off-site habitats. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated and provided.
- c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
- d) A cumulative effects analysis should be developed as described under CEQA Guideline, § 15130. General and specific plans, as well as

past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

- e) The document should include an analysis of the effect that the project may have on completion and implementation of regional and /or subregional conservation programs. Under § 2800-2840 of the Fish and Game Code, the Department, through the Natural Communities Conservation Planning (NCCP) program, is coordinating with local jurisdictions, landowners and the Federal Government to preserve local and regional biological diversity. The Department recommends that the lead agency ensure that the development of this project not preclude long-term preserve planning options and that projects conform with other requirements of the NCCP program.

- 3. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resource should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.

- a) Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize project impacts. Off-site compensation for unavoidable impacts through acquisition and protection of high-quality habitat elsewhere should be addressed.

- b) The Department considers Rare Natural Communities as sensitive habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts.

- c) The Department generally does not support the use of relocation, salvage, and /or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.

- 4. A California endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the

Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:

- a) Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
- b) A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

5. The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

- a) The Department has direct authority under Fish and Game code §1600 et seq. In regard to any proposed activity which would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any river, stream, or lake.
- b) A discussion of potential adverse impacts from any increased runoff, sedimentation, soil erosion, and/or pollutants on streams and watercourses on or near the project site, with mitigation measures proposed to alleviate such impacts must be included.
- c) The Department is in the process of complying with a writ of mandate issued by the Superior Court of California (Mendocino Environmental Center vs California Department of Fish and Game, Respondents, Bruce Choder, River Rat Salvage, et. al. Real Parties). The writ of mandate states:

A writ of mandate shall issue ordering the California Department of Fish and Game on or before May 1, 1999, to prepare and implement a program or process that will incorporate a CEQA review into the Fish and Game Section 1603 process. The writ of mandate shall further order the California Department of Fish and Game to cease and desist entering into Section 1603 agreements after May 1, 1999, unless such agreements have been subject to a CEQA review.

The writ of mandate clearly spells out what the Department's responsibilities are under CEQA with respect to all Streambed Alteration Agreements (SAA) (§1601 and 1603). In this regard, the Department is emphasizing in comment letters on projects that impacts to lakes or streambeds, alternatives and mitigation measures must be addressed in CEQA-certified documents prior to submittal of an application of a SAA. Any information which is supplied to the Department after the CEQA process is complete will not have been subject to the public review requirements of CEQA. In this instance, the Department has three choices: 1) refuse to issue the SAA; 2) not file the Notification because CEQA has not been complied with and return the package to the lead agency for further CEQA action; or 3) become the lead agency.

In order for the Department to process a SAA agreement, the CEQA-certified documents must include an analysis of the impacts of the proposed project on the lake or streambed, an analysis of the biological resources present on the site, copies of biological studies conducted on the site, biological survey methodology, and a discussion of any alternative measures, avoidance measures and mitigation measures which will reduce the impacts of the proposed development to a level of insignificance.

The Department appreciates the opportunity to comment on this project. Questions regarding this letter should be directed to Ms. Kimberly Nicol, Staff Environmental Scientist, at (760) 775-6108.

Sincerely,



Glenn Black
Senior Environmental Scientist
Eastern Sierra – Inland Deserts Region

cc: C.Hayes

DEPARTMENT OF TRANSPORTATION

TRANSPORTATION PLANNING - MS 32

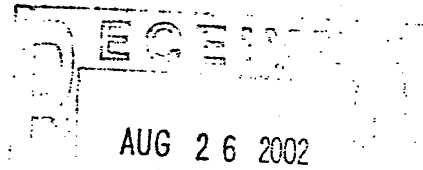
1120 N STREET

P.O. BOX 942874

SACRAMENTO, CA 94274-0001

Telephone (916) 653-9689

Fax (916) 653-1447



August 21, 2002

Michael D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
P.O. Box 937
Imperial, CA 92251

Subject: The California Department of Transportation's Review of State Clearinghouse #2001041104
Notice of Preparation of a Draft Environmental Impact Report for Imperial Irrigation
District's Desert Southwest Transmission Project

Dear Mr. Remington:

Thank you for the opportunity to review this State Clearinghouse notice. The California Department of Transportation (Department) has reviewed this document with the Department's headquarters Division of Traffic Operations, and the intergovernmental review branches in the Department's district 8 (San Bernardino) and 11 (San Diego) offices. The Department has the following comments:

- Any encroachment into, on or over the Department's right of way will require a Department encroachment permit. Department encroachment permits are discretionary and not ministerial. Longitudinal encroachments on restricted access right of way (i.e. primarily freeways, in this case I-10) are generally not allowed. There is an appeal process that allows exceptions to this general rule. Timely application for Department encroachment permits must be made to the District Encroachment Permit Engineer having jurisdiction (district jurisdictions are shown on the attached map). Sufficient time must be allowed for the Permit Engineer, district Environmental Branch, and other functional reviewers to analyze and review the project and its potential impacts to the Department's right of way, structures and facilities. These reviews might indicate the need for additional studies and clearances on historical, archaeological, environmental and transportation resources.
- If Native American lands are likely to be impacted, then their local communities should be notified.

If you have any questions regarding these comments or the attachment, call me at (916) 653-9689.

Sincerely,

William J. Costa, Manager
Intergovernmental Review Program
Department of Transportation

Attachment

cc: Rosa Clark, D-8, MS-726/IGR
Bill Figge, D-11, IGR
Becky Frank, SCH#2001041105
Paul Cavanaugh, HQ Permits

STATE OF CALIFORNIA
Business, Transportation and Housing Agency
Department of Transportation

JEFF MORALES

Director

California Department of Transportation

1120 N Street

P.O. Box 942874

Sacramento, CA 94274-0001*

Phone: (918) 654-2852

Calnet: 8-464-2852



**DISTRICT BOUNDARIES
AND
MAILING ADDRESSES**

PREPARED BY
TRANSPORTATION SYSTEM INFORMATION PROGRAM
OFFICE OF HIGHWAY SYSTEM ENGINEERING
12/00

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



August 23, 2002

AUG 27 2002

Michael D. Remington
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251

RE: SCH# 2001041105 - Imperial Irrigation District New 230 kV "BN-BS" Transmission Line, Imperial and Riverside Counties

Dear Mr. Remington:

The Native American Heritage Commission has reviewed the Notice of Preparation (NOP) regarding the above project. To adequately assess and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

- ✓ Contact the appropriate Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check.
 - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures.
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5 (e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Rob Wood
Environmental Specialist III
(916) 653-4040

CC: State Clearinghouse

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS - M.S.#40

1120 N STREET

P. O. BOX 942873

SACRAMENTO, CA 94273-0001

PHONE (916) 654-4959

FAX (916) 653-9531



*Flex your power!
Be energy efficient!*

September 20, 2002

OCT - 1 2002

Mr. Michel D. Remington
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251

Dear Mr. Remington:

Re: *Imperial Irrigation District Notice of Preparation (NOP) of an EIR/EIS for the
Desert Southwest Transmission Project*

The California Department of Transportation (Department), Division of Aeronautics, reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to CEQA. The following comments are offered for your consideration.

The proposal is for the construction of a new transmission line from a new substation/switching station on the north side of Hobsonway, west of the Blythe Power Plant in the vicinity of Blythe Airport. Airport-related noise and safety impacts and the potential for penetration of navigable airspace should be addressed in the EIR/EIS.

Depending on structural height and proximity to the Airport, a Notice of Proposed Construction or Alteration (Form 7460-1) may be required by the Federal Aviation Administration (FAA) in accordance with Federal Aviation Regulations Part 77. For information concerning the enclosed obstruction evaluation, please the FAA, Western-Pacific Region Office at the address on the form.

The proposal should be submitted to the Riverside County Airport Land Use Commission (ALUC) for a consistency determination. The proposal should also be coordinated with airport staff to ensure that the project will be compatible with future as well as existing airport operations.

In addition, in accordance with CEQA, Public Resources Code 21096, the Department's Airport Land Use Planning Handbook (Handbook) must be utilized as a resource in the preparation of environmental documents for projects within two miles of an airport. The Handbook can be accessed at www.dot.ca.gov/aeronautics under the Office of Technical Services or please contact this office to request a copy.

Mr. Michel D. Remington
September 20, 2002
Page 2

The need for compatible and safe land uses near airports in California is both a local and a state issue. Along with protecting individuals who reside or work near an airport, the Division of Aeronautics views each of the 250 public use airports in California as part of the statewide transportation system, which is vital to the state's continued prosperity. This role will no doubt increase as California's population continues to grow and the need for efficient mobility becomes more crucial. We strongly feel that the protection of airports from incompatible land use encroachment is vital to California's economic future.

These comments reflect the areas of concern to the Department's Division of Aeronautics with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our district office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

Sincerely,


SANDY HESNARD
Aviation Environmental Planner

Enclosure

c: Riverside County ALUC, Blythe Airport



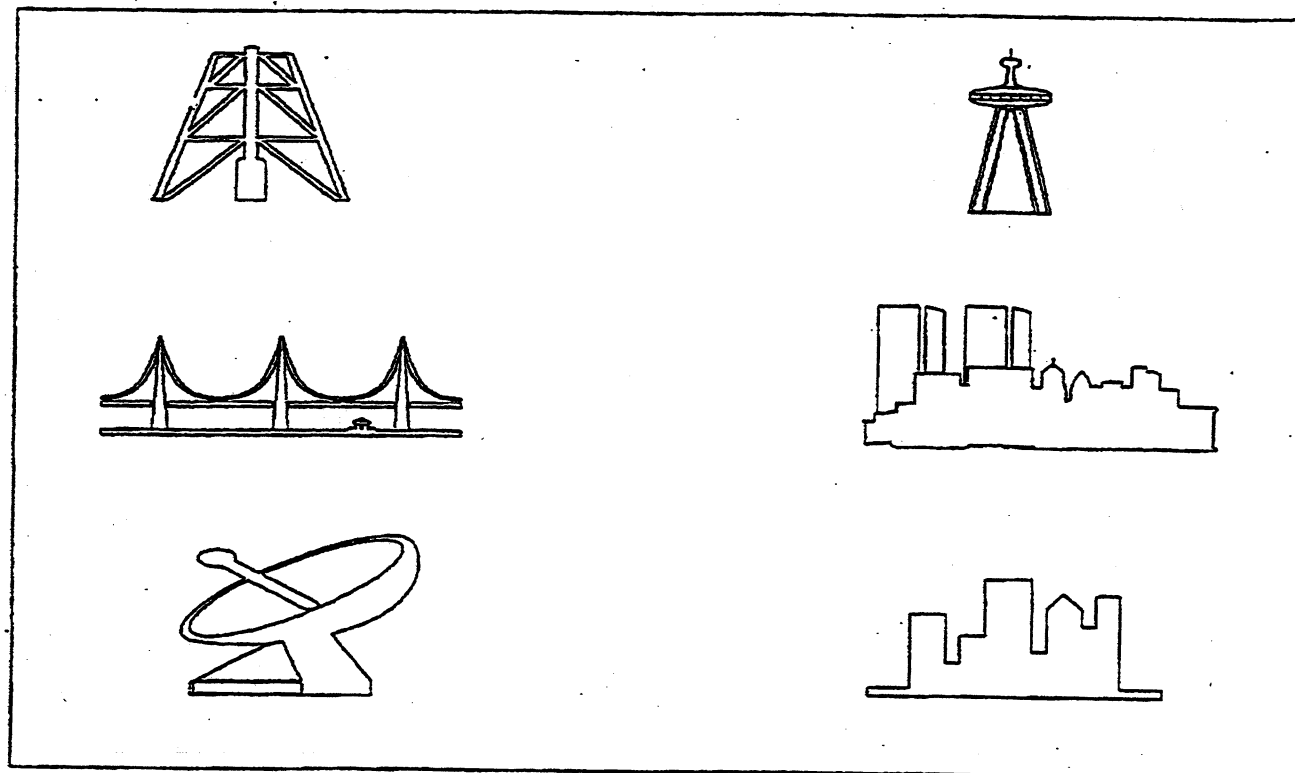
U.S. Department
of Transportation

**Federal Aviation
Administration**

ADVISORY CIRCULAR

AC 70/7460-2K

Proposed Construction or Alteration of Objects that May Affect the Navigable Airspace



Effective: March 1, 2000

Prepared by the Air Traffic
Airspace Management Program



U.S. Department
of Transportation

Federal Aviation
Administration

ADVISORY CIRCULAR

Subject: PROPOSED CONSTRUCTION OR ALTERATION OF OBJECTS THAT MAY AFFECT THE NAVIGABLE AIRSPACE

Date: 3/1/00

AC No: 70/7460.2K

Initiated by: ATA-400

1. PURPOSE.

This Advisory Circular (AC) provides information to persons proposing to erect or alter an object that may affect the navigable airspace. The AC also explains the requirement to notify the Federal Aviation Administration (FAA) before construction begins and FAA's responsibility to respond to these notices in accordance with Title 14 Code of Federal Regulations (14 CFR) part 77, Objects Affecting Navigable Airspace. Additionally, the AC explains the process by which to petition the FAA's Administrator for discretionary review of the determinations issued by the FAA.

2. CANCELLATION.

AC 70/7460-2J, Proposed Construction or Alteration of Objects That May Affect the Navigable Airspace, dated 11/29/95, is cancelled.

3. BACKGROUND/AUTHORITY.

a. 49 U.S.C. Section 44718 mandates, in pertinent part, that "The Secretary of Transportation shall require a person to give adequate public notice...of the construction or alteration, establishment or extension, or the proposed construction, alteration, establishment, or expansion, of any structure...when the notice will promote:

- (1) safety in air commerce, and
- (2) the efficient use and preservation of the navigable airspace and of airport traffic capacity at public-use airports."

b. To this end, 14 CFR Part 77 was issued prescribing that notice shall be given to the Administrator of certain proposed construction or alteration.

4. EFFECTIVE DATE.

This advisory circular becomes effective March 1, 2000.

5. NOTICES.

a. WHY IS NOTIFICATION REQUIRED?

In administering 14 CFR Part 77, the FAA's prime objectives are to ensure the safe and efficient use of the navigable airspace. The FAA recognizes that there are varied demands for the use of airspace, both by aviation and nonaviation interests. When conflicts arise out of construction proposals, the FAA emphasizes the need for conserving the navigable airspace. Therefore, early notice of proposed construction or alteration provides the FAA the opportunity to:

(1) Recognize potential aeronautical hazards to minimize the adverse effects to aviation.

(2) Revise published data or issue a Notice to Airmen (NOTAM) to alert pilots to airspace or procedural changes made as a result of the structure.

(3) Recommend appropriate marking and lighting to make objects visible to pilots. Before filing FAA Form 7460-1, Notice of Proposed Construction or Alteration, construction sponsors should become knowledgeable in the different types of obstruction marking and lighting systems that meet FAA standards. Information about these systems can be obtained from the manufacturers. Proponents can then determine which system best meets their needs based on purchase, installation, and maintenance costs. The FAA will make every effort to accommodate the request.

(4) Depict obstacles on aeronautical charts for pilotage and safety.

b. WHO MUST FILE NOTICE?

Any person or an agent who intends to sponsor construction is required to submit notice to the Administrator if the proposed construction or alteration falls within any of the following categories:

(1) *Greater than 200 feet in height.* The proposed object would be more than 200 feet above ground level (AGL) at its location.

NOTE-

See FIG 1 and FIG 2.

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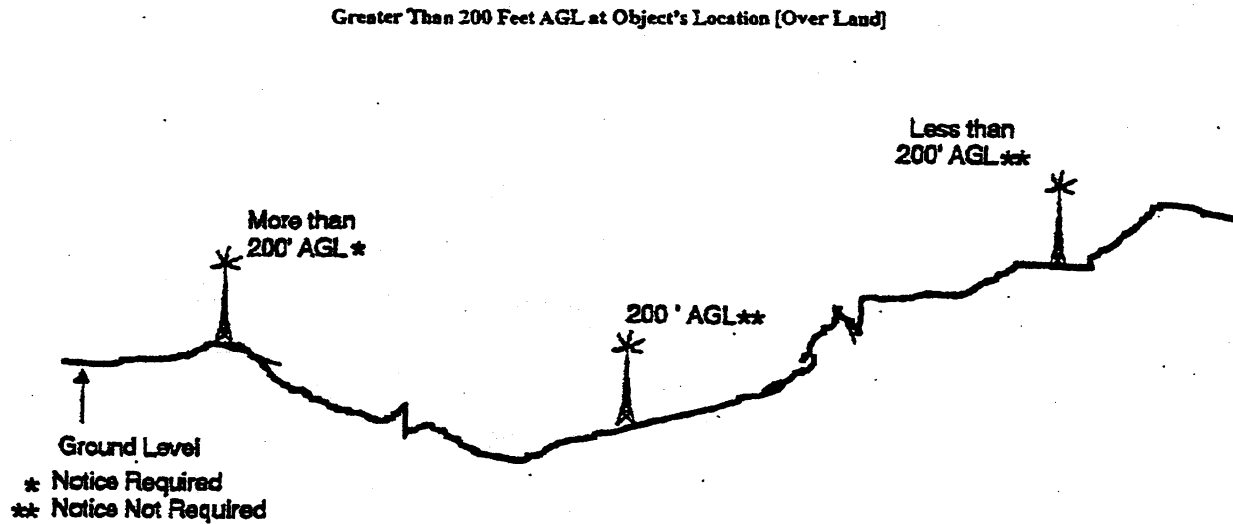


FIG 1

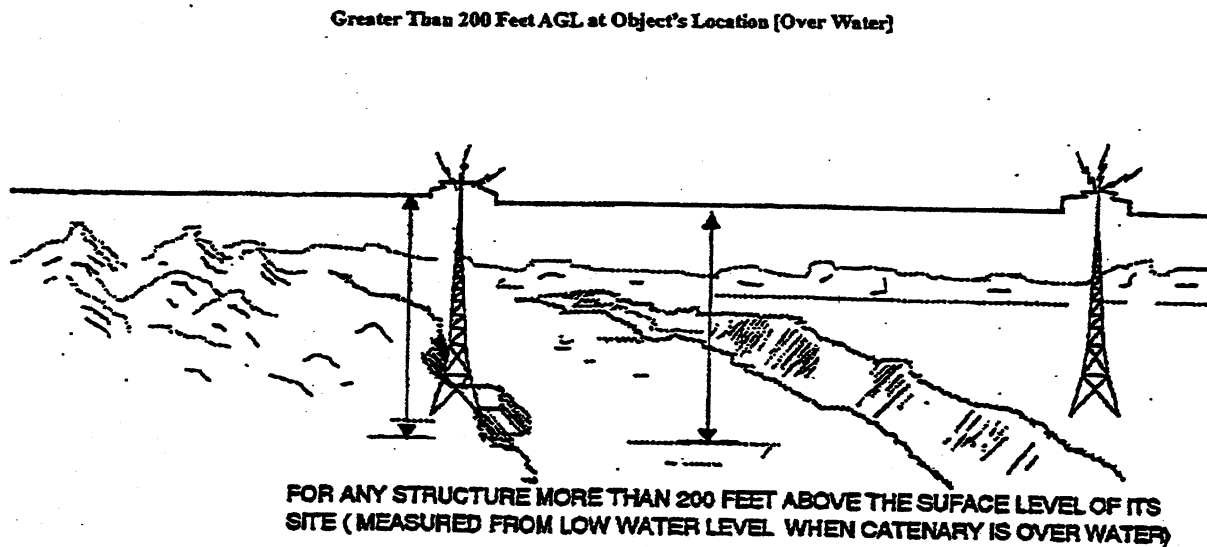


FIG 2

(2) *Near a Public-Use or Military Airport, Heliport, or Seaplane Base.* A public use airport, heliport or a seaplane base with visually marked seaplanes that is listed in the current Airport Facility Directory, the Alaska Supplement or the Pacific Chart Supplement, or near an airport operated by an armed force of the United States.

(a) *Airport or Seaplane Base.* The proposed object or alteration would be within:

(1) 20,000 feet of an airport or seaplane base with at least one runway more than 3,200 feet in length

and the object would exceed a slope of 100:1 horizontally (100 feet horizontally for each 1 foot vertically) from the nearest point of the nearest runway.

(2) 10,000 feet of an airport or seaplane base that does not have a runway more than 3,200 feet in length and the object would exceed a 50:1 horizontal slope (50 feet horizontally for each 1 foot vertically) from the nearest point of the nearest runway.

NOTE-
See FIG 3.

Object Penetrates Airport/Seaplanes Base Surface

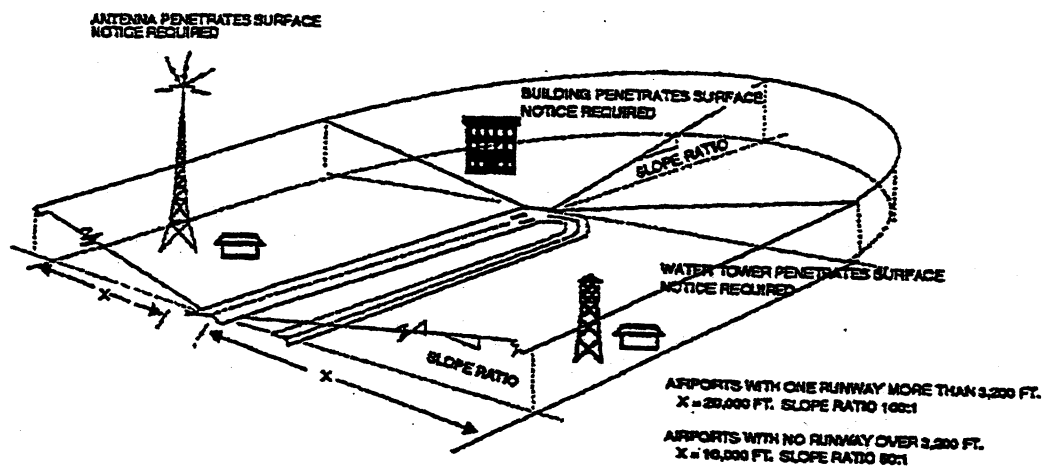


FIG 3

(b) *Heliport.* The proposed object would be within 5,000 feet of a heliport and would exceed a 25:1 horizontal slope (25 feet horizontally for each 1 foot vertically) from the nearest landing and takeoff area of that heliport.

NOTE-
See FIG 4.

Object Penetrates Heliport Surface

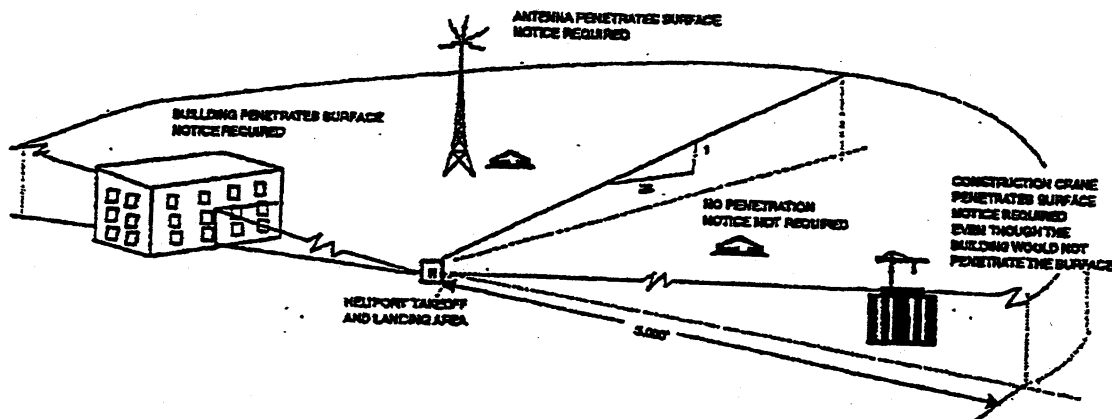


FIG 4

(3) *Highways and Railroads.* The proposed object is a traverse way which would exceed one or more of the standards listed in paragraphs a and b above, after the height of the object is adjusted upward as follows:

(a) Private road: 10 feet or the height of the highest mobile object that would traverse the roadway, whichever is greater.

(b) Other public roadways: 15 feet.

(c) Interstate Highways: 17 feet.

(d) Railroad: 23 feet.

(e) Waterway or any other thoroughfare not previously mentioned: an amount equal to the highest mobile object that would traverse the waterway or thoroughfare.

NOTE-
See FIG 5.

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Proposed Object in a Traverse Way

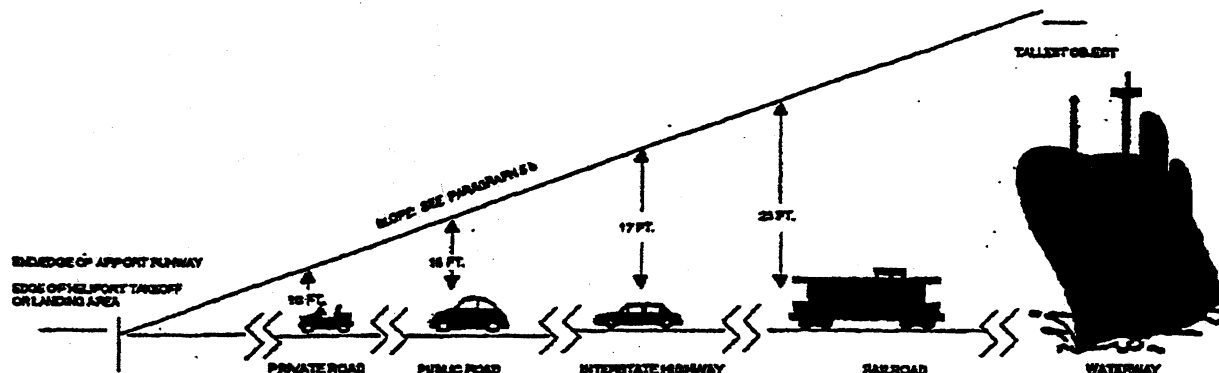


FIG 5

(4) *Objects on a Public-Use or Military Airport or Heliport.* The proposed construction or alteration would be on an airport or heliport, or any airport operated by an armed force of the United States, regardless of height or location.

(5) *When Requested by the FAA.* The FAA may request notice if available information indicates the proposal may exceed an obstruction standard or the proposal may cause electromagnetic interference to aircraft, particularly construction associated with an AM, FM, or TV station including a change in authorized frequency or transmitting power, may cause transmitted signals to be reflected upon ground-based or airborne air navigation communications equipment, or affect instrument procedures. In addition, notice may be requested when the proposal may affect an air traffic control procedure, may obstruct air traffic controllers' line of sight capability, or may affect air traffic control radar.

c. WHAT KIND OF STRUCTURES REQUIRE FAA NOTIFICATION?

The following are examples of structures requiring notice to the FAA.

(1) Proposed construction or alteration of structures such as:

- (a) Buildings.
- (b) Antenna Towers.
- (c) Roadways.
- (d) Overhead communications and transmission lines as well as the height of the supporting structures.
- (e) Water towers and the supporting structure.

(2) Construction equipment or other temporary structures such as:

- (a) Cranes.
- (b) Derricks.
- (c) Stockpiles of equipment.
- (d) Earth moving equipment.

d. WHEN MUST NOTICES BE FILED?

Notice must be submitted:

(1) At least 30 days before the earlier of the following:

- (a) The date the proposed construction or alteration is to begin, or
- (b) The date the application for a construction permit will be filed.

(2) On or before the date the application for construction is filed with the Federal Communications Commission (FCC), if the proposed structure is subject to FCC licensing requirements.

(3) Immediately by telephone or other expeditious means to the nearest FSS, with written notification submitted within 5 days thereafter, if immediate construction or alteration is required as in cases involving public services, health or safety.

(4) As early as possible in the planning stage but not less than 30 days before construction will begin.

e. HOW AND WHERE TO FILE NOTICE.

Notification of the proposal should be made on FAA Form 7460-1, Notice of Proposed Construction or Alteration. Additional information such as charts and/or drawings that accurately depict the proposed construction or alteration should be included to

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facilitate the FAA's analysis of the project. The completed form should be mailed to the Manager, Air Traffic Division, of the regional office having jurisdiction over the area within which the construction or alteration will occur.

NOTE-

Information on regional addresses may be found on the FAA's website at www.faa.gov/ats/ata/ata-400/oeaaa.htm or contact the FAA listed in local telephone books under United States Government.

I. PENALTY FOR FAILING TO PROVIDE NOTICE.

Persons who knowingly and willfully violate the notice requirements of 14 CFR part 77 are subject to a civil penalty.

g. COMPLIANCE RESPONSIBILITY.

A notice filed with the FAA does not relieve the proponent of compliance with laws, ordinances or regulations of any other Federal, state or local governmental entity.

h. ASSOCIATED PUBLICATIONS.

The following publications contain obstruction criteria, marking and lighting standards and specifications for lighting and paint.

(1) *Federal Aviation Regulations 14 CFR, part 77, Objects Affecting Navigable Airspace*. This part sets forth the requirements for notice to the FAA of proposed construction or alteration and provides standards for determining obstructions to navigable airspace. 14 CFR, part 77 (Stock No. 050-007-00276-9) may be ordered from:

Superintendent of Documents
U. S. Government Printing Office
Washington, DC 20402

(2) *Advisory Circulars*. FAA advisory circulars are available free of charge from:

Department of Transportation
TASC
Subsequent Distribution Office,
SVC-121.23
Ardmore East Business Center
3341 Q 75th Avenue
Landover, MD 20785

(a) *AC 70/7460-1, Obstruction Marking and Lighting*, describes the standards for marking and lighting structures such as buildings, chimneys, antenna towers, cooling towers, storage tanks, supporting structures of overhead wires, etc.

(b) *AC 150/5190-4, A Model Zoning Ordinance to Limit Height or Objects Around Airports*, provides a

model-zoning ordinance to be used as a guide to control the height of objects around airports.

(c) *AC 150/5300-13, Airport Design*, includes planning information on electronic and visual navigational aids and air traffic control facility siting and clearance requirements that influence the physical layout of airports.

(d) *AC 150/5345-53, Airport Lighting Equipment Certification Program*, addendum lists equipment model numbers and manufacturer's part numbers in compliance with item (e) below. The addendum is located on the Internet at the Office of Airports homepage: <http://www.faa.gov/arp/arp/home.htm> under Advisory Circulars.

(e) *AC 150/5345-43, Specification for Obstruction Lighting Equipment*, contains specifications for equipment used in obstruction lighting systems.

(3) *Marking Specifications and Standards*. Aviation colors and paint standards and specifications are available from:

General Services Administration
Specifications Section
470 L'Enfant Plaza, Suite 8214
Washington, DC 20407

(4) *FAA Forms*. FAA forms are available free of charge from all FAA regional offices.

(a) *FAA Form 7460-1, Notice of Proposed Construction or Alteration*, is used to notify the FAA of proposed construction or alteration of an object that may affect the navigable airspace.

(b) *FAA Form 7460-2, Notice of Actual Construction or Alteration*, is used to notify the FAA of progress or abandonment, as requested on the form. The FAA regional office routinely includes this form with a determination when such information will be required. The information is used for charting purposes, to change affected aeronautical procedures and to notify pilots of the location of the structure.

I. ADMINISTRATIVE ASSISTANCE TO CONSTRUCTION PROPONENTS.

(1) Airspace specialists are available in each regional office to assist proponents in filing their notice. Proponents are encouraged to call in advance for appointments. Limited resources often prevent the specialist from responding spontaneously without advanced planning or preparation.

(2) To insure timely determinations, construction proponents must submit complete and accurate data. Lack of complete and accurate data could result in the return of the form. United States Geological Survey quadrangle maps are available at nominal costs to aid in determining

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the geographical coordinates (latitude/longitude) and site elevation above mean sea level. The latitude/longitude information should be submitted in North American Datum of 1983. The quadrangle maps can be obtained from:

U.S. Geological Survey
Reston, Virginia 22092
Telephone No. (703) 860-6045

U.S. Geological Survey
District Branch
P.O. Box 25286, Bldg. #41
Denver, Colorado 80225
Telephone No. (303) 844-4169

(3) Airport planners are available for assistance with construction proposals on Federally obligated airports.

(4) Proposals for electronic transmitting devices should include frequency, effective radiated power (ERP), radiation center height (RCAMSL), and antenna characteristics such as number of bays, beam tilt, and null fill.

6. FAA's RESPONSIBILITY.

a. The FAA will acknowledge receipt of the notice.

b. After initial screening, the outcome of the screening will be sent to the filer and may state one of the following:

(1) The proposal is not identified as an obstruction and would not be a hazard to air navigation, or

(2) The proposal would be an obstruction unless reduced to a specified height and is presumed to be a hazard to air navigation pending further study. When this is indicated, the acknowledgement will either specify that the FAA has initiated further study, or the proponent may elect to reduce the height or request further study within (sixty) 60 days, in which event, the FAA will begin the study when the proponent so advises.

c. If further aeronautical study is initiated, public notice may be prepared and distributed for comments to those agencies, organizations, or individuals with known aeronautical interests to determine if the proposal would be a hazard to air navigation. State and local aviation authorities, as well as various military organizations of the Department of Defense, are also offered the opportunity to comment on the aeronautical effects of the proposal.

d. All responses received by the end of the specified comment period are analyzed by the FAA regional specialists for valid aeronautical comments and objections.

e. The office conducting the study may decide to conduct an informal airspace meeting with interested parties to discuss the effects of the proposal and to gather additional facts or information relevant to the study.

f. The FAA specialists may negotiate with the proponent during the study process to resolve any adverse

effect(s) on aeronautical operations. Many times, a minor reduction in height and/or relocation of a proposed structure will eliminate or sufficiently minimize adverse aeronautical effects that would permit the issuance of a Determination of No Hazard to Air Navigation.

g. After the aeronautical study is completed, the regional office will normally issue a:

(1) Determination of Hazard to Air Navigation; or

(2) Determination of No Hazard to Air Navigation.

h. An FAA determination is a conclusion based on the study of a structure's projected impact on the safe and efficient use of the navigable airspace by aircraft. It should not be construed as an approval or disapproval of the project.

i. The FAA usually recommends marking and/or lighting of a structure when its height exceeds 200 feet above ground level (AGL) or exceeds Part 77 obstruction criteria. However, the FAA may recommend marking and/or lighting of a structure that does not exceed 200 feet AGL or Part 77 obstruction standards because of its particular location.

7. HOW TO PETITION THE ADMINISTRATOR FOR DISCRETIONARY REVIEW.

a. When a determination is issued under 14 CFR Section 77.19 (except Section 77.19 c.(1)), or Section 77.35 or when a revision or extension is issued under Section 77.39 (c), you may petition the FAA Administrator for a review of the determination, revision, or extension if you:

(1) Are the sponsor of the proposed construction or alteration,

(2) Stated a substantial aeronautical objection to the proposal during an aeronautical study, or

(3) Have a substantial aeronautical objection but were not given an opportunity to state it.

b. The petition must be submitted within 30 days after the issue date of the determination, revision, or extension and must contain a full statement of the basis upon which it is made. Submit an original and two copies to:

Manager, Airspace and Rules
Division, ATA-400
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Nancy Kalinowski

John S. Walker

Program Director, Air Traffic
Airspace Management Program

NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

§77.13 Construction or alteration requiring notice.

(a) Except as provided in §77.15, each sponsor who proposes any of the following construction or alteration shall notify the Administrator in the form and manner prescribed in §77.17:

- (1) Any construction or alteration of more than 200 feet in height above the ground level at its site.
- (2) Any construction or alteration of greater height than an imaginary surface extending outward and upward at one of the following slopes:
 - (i) 100 to 1 for a horizontal distance of 20,000 feet from the nearest point of the nearest runway of each airport specified in paragraph (a) (5) of this section with at least one runway more than 3,200 feet in actual length, excluding heliports.
 - (ii) 50 to 1 for a horizontal distance of 10,000 feet from the nearest point of the nearest runway of each airport specified in paragraph (a) (5) of this section with its longest runway no more than 3,200 feet in actual length, excluding heliports.
 - (iii) 25 to 1 for a horizontal distance of 5,000 feet from the nearest point of the nearest landing and takeoff area of each heliport specified in paragraph (a) (5) of this section.

(3) Any highway, railroad, or other traverse way for mobile objects, of a height which, if adjusted upward 17 feet for an Interstate Highway that is part of the National System of Military and Interstate Highways where overcrossings are designed for a minimum of 17 feet vertical distance, 15 feet for any other public roadway, 10 feet or the height of the highest mobile object that would normally traverse the road, whichever is greater, for a private road, 23 feet for a railroad, and for a waterway or any other traverse way not previously mentioned, an amount equal to the height of the highest mobile object that would normally traverse it, would exceed a standard of paragraph (a) (1) or (2) of this section.

(4) When requested by the FAA, any construction or alteration that would be in an instrument approach area (defined in the FAA standards governing instrument approach procedures) and available information indicates it might exceed a standard of Subpart C of this part.

(5) Any construction or alteration on any of the following airports (including heliports):

- (i) An airport that is available for public use and is listed in the Airport Directory of the current Airman's Information Manual or in either the Alaska or Pacific Airman's Guide and Chart Supplement.
- (ii) An airport under construction, that is the subject of a notice or proposal on file with the Federal Aviation Administration, and except for military airports, it is clearly indicated that that airport will be available for public use.
- (iii) An airport that is operated by an armed force of the United States.

(b) Each sponsor who proposes construction or alteration that is the subject of a notice under paragraph (a) of this section and is advised by an FAA regional office that a supplemental notice is required shall submit that notice on a prescribed form to be received by the FAA regional office at least 48 hours before the start of construction or alteration.

(c) Each sponsor who undertakes construction or alteration that is the subject of a notice under paragraph (a) of this section shall, within 5 days after that construction or alteration reaches its greatest height, submit a supplemental notice on a prescribed form to the FAA regional office having jurisdiction over the region involved, if —

- (1) The construction or alteration is more than 200 feet above the surface level of its site; or
- (2) An FAA regional office advises him that submission of the form is required.

§77.15 Construction or alteration not requiring notice.

No person is required to notify the Administrator for any of the following construction or alteration:

- (a) Any object that would be shielded by existing structures of a permanent and substantial character or by natural terrain or topographic features of equal or greater height, and would be located in the congested area of a city, town, or settlement where it is evident beyond all reasonable doubt that the structure so shielded will not adversely affect safety in air navigation.
- (b) Any antenna structure of 20 feet or less in height except one that would increase the height of another antenna structure.
- (c) Any air navigation facility, airport visual approach or landing aid, aircraft arresting device, or meteorological device, of a type approved by the Administrator, or an appropriate military service or military airports, the location and height of which is fixed by its functional purpose.
- (d) Any construction or alteration for which notice is required by any other FAA regulation.

§77.17 Form and time of notice.

(a) Each person who is required to notify the Administrator under §77.13 (a) shall send one executed form set of FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the Manager, Air Traffic Division, FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. Copies of FAA Form 7460-1 may be obtained from the headquarters of the Federal Aviation Administration and the regional offices.

(b) The notice required under §77.13 (a) (1) through (4) must be submitted at least 30 days before the earlier of the following dates —

- (1) The date the proposed construction or alteration is to begin.
- (2) The date an application for a construction permit is to be filed.

However, a notice relating to proposed construction or alteration that is subject to the licensing requirements of the Federal Communications Act may be sent to the FAA at the same time the application for construction is filed with the Federal Communications Commission, or at any time before that filing.

(c) A proposed structure or an alteration to an existing structure that exceeds 2,000 feet in height above the ground will be presumed to be a hazard to air navigation and to result in an inefficient utilization of airspace and the applicant has the burden of overcoming that presumption. Each notice submitted under the pertinent provisions of this part 77 proposing a structure in excess of 2,000 feet above ground, or an alteration that will make an existing structure exceed that height, must contain a detailed showing, directed to meeting this burden. Only in exceptional cases, where the FAA concludes that a clear and compelling showing has been made that it would not result in an inefficient utilization of the airspace and would not result in a hazard to air navigation, will a determination of no hazard be issued.

(d) In the case of an emergency involving essential public services, public health, or public safety that requires immediate construction or alteration, the 30 day requirement in paragraph (b) of this section does not apply and the notice may be sent by telephone, telegraph, or other expeditious means, with an executed FAA Form 7460-1 submitted within five (5) days thereafter. Outside normal business hours, emergency notices by telephone or telegraph may be submitted to the nearest FAA Flight Service Station.

(e) Each person who is required to notify the Administrator by paragraph (b) or (c) of §77.13, or both, shall send an executed copy of FAA Form 7460-2, Notice of Actual Construction or Alteration, to the Manager, Air Traffic Division, FAA Regional Office having jurisdiction over the area involved.

ADDRESSES OF THE REGIONAL OFFICES

Alaska Region

AK
Alaskan Regional Office
Air Traffic Division, AAL-520
222 West 7th Avenue
Anchorage, AK 99513
Tel: 907-271-5893

Central Region

IA, KS, MO, NE
Central Regional Office
Air Traffic Division, ACE-520
60 East 12th Street
Kansas City, MO 64106
Tel: 816-426-3408 or 3409

Eastern Region

DC, DE, MD, NJ, NY, PA, VA, WV
Eastern Regional Office
Air Traffic Division, AEA-520
JFK International Airport
Fitzgerald Federal Building
Jamaica, NY 11430
Tel: 718-553-2616

Great Lakes Region

IL, IN, MI, MN, ND, OH, SD, WI
Great Lakes Regional Office
Air Traffic Division, AGL-520
2300 East Devon Avenue
Des Plaines, IL 60018
Tel: 847-294-7568

Northwest Mountain Region

CO, ID, MT, OR, UT, WA, WY
Northwest Mountain Regional Office
Air Traffic Division, ANM-520
1601 Lind Avenue, SW
Renton, WA 98055-4056
Tel: 425-227-2520

Southern Region

AL, FL, GA, KY, MS, NC, PR,
SC, TN, VI
Southern Regional Office
Air Traffic Division, ASO-520
1701 Columbia Avenue
College Park, GA 30337
Tel: 404-305-5585

Southwest Region

AR, LA, NM, OK, TX
Southwest Regional Office
Air Traffic Division, ASW-520
2601 Meacham Boulevard
Fort Worth, TX 76137-0520
Tel: 817-222-5531

Western Pacific Region

HI, CA, NV, AZ, GU
Western-Pacific Regional Office
Air Traffic Division, AVWP-520
15000 Aviation Boulevard
Hawthorne, CA 90260
Tel: 310-725-6557

INSTRUCTIONS FOR COMPLETING FAA FORM 7460-1

PLEASE TYPE or PRINT

ITEM #1. Please include the name, address, and phone number of a personal contact point as well as the company name.

ITEM #2. Please include the name, address, and phone number of a personal contact point as well as the company name.

ITEM #3. New Construction would be a structure that has not yet been built.

Alteration is a change to an existing structure such as the addition of a side mounted antenna, a change to the marking and lighting, a change to power and/or frequency, or a change to the height. The nature of the alternation shall be included in ITEM #21 "Complete Description of Proposal".

Existing would be a correction to the latitude and/or longitude, a correction to the height, or if filing on an existing structure which has never been studied by the FAA. The reason for the notice shall be included in ITEM #21 "Complete Description of Proposal".

ITEM #4. If Permanent, so indicate. If Temporary, such as a crane or drilling derrick, enter the estimated length of time the temporary structure will be up.

ITEM #5. Enter the date that construction is expected to start and the date that construction should be completed.

ITEM #6. Please indicate the type of structure. **DO NOT LEAVE BLANK.**

ITEM #7. In the event that obstruction marking and lighting is required, please indicate type desired. If no preference, check "other" and indicate "no preference". **DO NOT LEAVE BLANK.** NOTE: High intensity lighting shall be used only for structures over 500' AGL. In the absence of high intensity lighting for structures over 500' AGL, marking is also required.

ITEM #8. If this is an existing tower that has been registered with the FCC, enter the FCC Antenna Structure Registration number here.

ITEM #9. and #10. Latitude and longitude must be geographic coordinates, accurate to within the nearest second or to the nearest hundredth of a second if known. Latitude and longitude derived solely from a hand-held GPS instrument is NOT acceptable. A hand-held GPS is only accurate to within 100 meters (328 feet) 95 per cent of the time. This data, when plotted, should match the site depiction submitted under ITEM #20.

ITEM #11. NAD 83 is preferred; however, latitude/longitude may be submitted in NAD 27. Also, in some geographic areas where NAD 27 and NAD 83 are not available other datums may be used. It is important to know which datum is used. **DO NOT LEAVE BLANK.**

ITEM #12. Enter the name of the nearest city/state to the site. If the structure is or will be in a city, enter the name of that city/state.

ITEM #13. Enter the full name of the nearest public-use (not private-use) airport (or heliport) or military airport (or heliport) to the site.

ITEM #14. Enter the distance from the airport or heliport listed in #13 to the structure.

ITEM #15. Enter the direction from the airport or heliport listed in #13 to the structure.

ITEM #16. Enter the site elevation above mean sea level and expressed in whole feet rounded to the nearest foot (e.g. 17' 3" rounds to 17', 17' 6" rounds to 18'). This data should match the ground contour elevations for site depiction submitted under ITEM #20.

ITEM #17. Enter the total structure height above ground level in whole feet rounded to the next highest foot (e.g. 17' 3" rounds to 18'). The total structure height shall include anything mounted on top of the structure, such as antennas, obstruction lights, lightning rods, etc.

ITEM #18. Enter the overall height above mean sea level and expressed in whole feet. This will be the total of ITEM #16 + ITEM #17.

ITEM #19. If an FAA aeronautical study was previously conducted, enter the previous study number.

ITEM #20. Enter the relationship of the structure to roads, airports, prominent terrain, existing structures, etc. Attach an 8-1/2" X 11" non-reduced copy of the appropriate 7.5 minute U.S. Geological Survey (USGS) Quadrangle Map MARKED WITH A PRECISE INDICATION OF THE SITE LOCATION. To obtain maps, Contact USGC at 1-800-435-7627 or via Internet at "http://mapping.usgs.gov". If available, attach a copy of a documented site survey with the surveyor's certification stating the amount of vertical and horizontal accuracy in feet.

ITEM #21.

- For transmitting stations, include maximum effective radiated power (ERP) and all frequencies.
- For antennas, include the type of antenna and center of radiation (Attach the antenna pattern, if available).
- For microwave, include azimuth relative to true north.
- For overhead wires or transmission lines, include size and configuration of wires and their supporting structures (Attach depiction).
- For each pole/support, include coordinates, site elevation, and structure height above ground level or water.
- For buildings, include site orientation, coordinates of each corner, dimensions, and construction materials.
- For alterations, explain the alteration thoroughly.
- For existing structures, thoroughly explain the reason for notifying the FAA (e.g. corrections, no record of previous study, etc.).

Filing this information with the FAA does not relieve the sponsor of this construction or alteration from complying with any other federal, state or local rules or regulations. If you are not sure what other rules or regulations apply to your proposal, contact local/state aviation and zoning authorities.

Paperwork Reduction Work Act Statement: This information is collected to evaluate the effect of proposed construction or alteration on air navigation and is not confidential. Providing this information is mandatory for anyone proposing construction or alteration that meets or exceeds the criteria contained in 14 CFR, part 77. We estimate that the burden of this collection is an average 19 minutes per response. An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control number for this collection is 2120-0001.

Form Approved OMB No. 2120-0001



U.S. Department of Transportation
Federal Aviation Administration

Failure To Provide All Requested Information May Delay Processing of Your Notice

Notice of Proposed Construction or Alteration

FOR FAA USE ONLY
Aeronautical Study Number

NSN: 0052-00-012-0009

LETTER "G"

DSWT

STATE OF CALIFORNIA

GRAY DAVIS, Governor

CALIFORNIA STATE LANDS COMMISSION

100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202



PAUL D. THAYER, *Executive Officer*
(916) 574-1800 FAX (916) 574-1810
Toll Free Service From TDD Phone 1-800-735-2922
from Voice Phone 1-800-735-2929

Contact Phone: (916) 574-1817
Contact FAX: (916) 574-2066

October 8, 2002

Mr. Michael D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
P.O. Box 937
Imperial, CA 92251

OCT 15 2002

RE: DESERT SOUTHWEST TRANSMISSION PROJECT

Dear Mr. Remington:

This letter is in response to your request for comments pertaining to the Revised Notice of Preparation dated July 31, 2002, for the Imperial Irrigation District (IID) and Bureau of Land Management's joint Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) for the Desert Southwest Transmission Project. The California State Lands Commission (CSLC) was unable to respond to the Notice prior to the scoping comments period deadline of August 30, 2002; however, the CSLC has an interest in the proposed project as it has jurisdiction over State-owned school lands that the project may impact.

The project involves the construction, operation, and maintenance of a transmission line to be constructed from a new substation/switching station located on the north side of Hobsonway, approximately 4.5 miles west of Blythe, CA, to the Southern California Edison's Devers Substation located approximate 10 miles north of Palm Springs, CA. The total distance of the line is to be approximately 118 miles long and will operate at either 230-kV or 500-kV. The line is to provide increased transmission line capabilities from the proposed new substation/switching station near Blythe to the Devers Substation (north of Palm Springs) to meet transmission requests.

A review of the map attached to the Notice indicates the proposed location of the new substation in Blythe and the proposed routes for the transmission line. Alternatives A and C run along Interstate 10 between the Devers Substation (north of Palm Springs) and the new substation/switching station just east of Blythe. There are a few State-owned school land parcels that lie near the Interstate 10 corridor. Without a precise location of the proposed transmission line, the CSLC is unable to determine if any of the proposed alternatives cross any of these school lands.

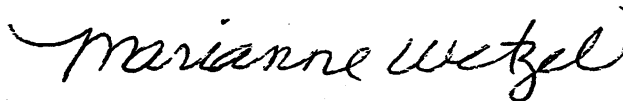
Mr. Michael D. Remington
October 8, 2002
Page 2 of 2

Alternative B runs from the new substation/switching station near Blythe south along Highway 78 to Glamis, CA, where it takes a turn to the northwest up towards the Midway Station near Niland, CA, where it connects into an existing transmission line. The existing transmission line appears to run from the Midway station in a northwesterly direction along the north side of Highway 111 (on the north shore of the Salton Sea), until it intersects with Interstate 10. From this point, a new line would be constructed to connect up with the Devers Substation. There are several State-owned school lands parcels that are located near Highway 78 as well as along the north side of Highway 111 and the Salton Sea. Again, it would be impossible to determine whether or not Alternative B would impact any of the school lands parcels as the exact location of the proposed route has not been provided to us.

Is the Draft EIR/EIS going to identify the exact location, including the legal description, of the proposed routes of the transmission line? If not, the CSLC requests that this information be provided to it in order to identify whether or not any school lands are to be impacted by the proposed transmission line. If State-owned lands are to be impacted by the project, the DEIR/DEIS should identify this. The applicant will be required to obtain authorization from the CSLC before any proposed activity or development could be permitted on the State lands. I can be contacted for information or questions about the lease application/authorization process, at (916) 574-1817.

Thank you for this opportunity to comment on the Notice of Preparation.

Sincerely,



Marianne Wetzel
Public Land Management Specialist

cc: Dwight Sanders, DEPM
Bob Lynch, LMD
Hap Anderson, LMD



LETTER "H"

PALO VERDE IRRIGATION DISTRICT

180 WEST 14TH AVENUE - BLYTHE, CALIFORNIA 92225

TELEPHONE (760) 922-3144 - FAX (760) 922-8294



August 6, 2002

Mr. Michel D. Remington
Imperial Irrigation District
PO Box 937
Imperial, Ca 92251

Re: Desert Southwest Transmission Project

Dear Mr. Remington:

Thank you for the Notice of Preparation of the Draft EIR/EIS for the Desert Southwest Transmission Project. Please correct your mailing list's contact person to be Mr. Ed Smith, General Manager instead of Hal Reynolds for future mailings. PVID would like to receive a copy of the Draft EIR/EIS.

Thank you
Roger Henning
Roger Henning
Chief Engineer

Rh:rh

AUG - 8 2002

SAFETY COMPATIBILITY

Safety of persons on the ground near airports is an important consideration in airport vicinity land use planning. At the same time, the safety of pilots and passengers in aircraft forced to make emergency landings is also an important concern.

Aircraft accident records from around the country show that accidents and emergency landings are most common along the extended runway centerline and relatively near to the airport. The risk decreases as distance from the airport increases. Areas of lesser risk are beneath the commonly used flight patterns.

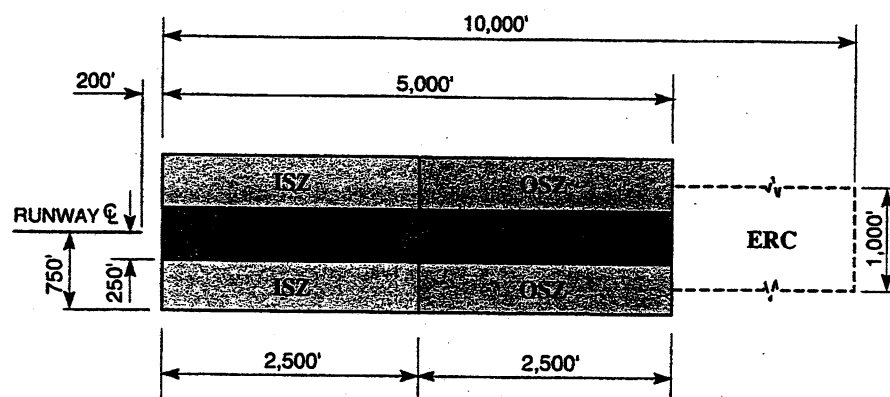
The Comprehensive Land Use Plan establishes five safety zones with the standards shown in Table 2.

The dimensions of the first four safety zones are shown in Exhibit 3. The sizes of the ETZ, ISZ, and OSZ vary

**Table 2 - LAND USE
COMPATIBILITY STANDARDS FOR SAFETY ZONES**

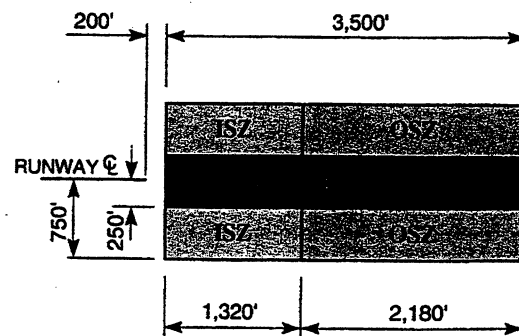
ETZ EXTENDED TOUCHDOWN ZONE -	No structures, no obstructions.
ISZ INNER SAFETY ZONE -	No structures, no powerlines or petroleum storage.
OSZ OUTER SAFETY ZONE -	Limit density of structures. No residential land uses or others involving large numbers of people or hazardous materials.
ERC EXTENDED RUNWAY CENTERLINE -	Limit density of structures, dwellings. Limit land uses with large numbers of people. No land uses involving hazardous materials.
TPZ TRAFFIC PATTERN ZONE -	Limit density of structures. Discourage land uses with very high concentrations of people. Discourage land uses involving hazardous materials.

Exhibit 3 - AIRPORT SAFETY ZONES OFF RUNWAY ENDS



**PRECISION AND NON-PRECISION
INSTRUMENT RUNWAYS
- JET AIRCRAFT -**

**VISUAL APPROACH RUNWAYS
- TWIN ENGINE AIRCRAFT -**



depending on the type of runway. Runways with instrument approaches, or runways serving jet traffic, have larger areas than those with only visual approaches or serving only twin engine or smaller aircraft.

ends of runways, extending up from the ground and fanning outward as distance from the runway end increases. **Exhibit 4** shows the Part 77 surfaces for Blythe Airport.

The Comprehensive Land Use Plan has height standards that prohibit the construction of structures exceeding the height limits defined by the F.A.R. Part 77 surfaces for Blythe Airport.

At Blythe Airport, the existing east-west runway (Runway 8-26) has the largest safety zones since it has instrument approaches and can be used by jets. Runway 17-35 serves only light twin and single engine aircraft and has no instrument approaches. The smaller safety zones are defined off the ends of that runway.

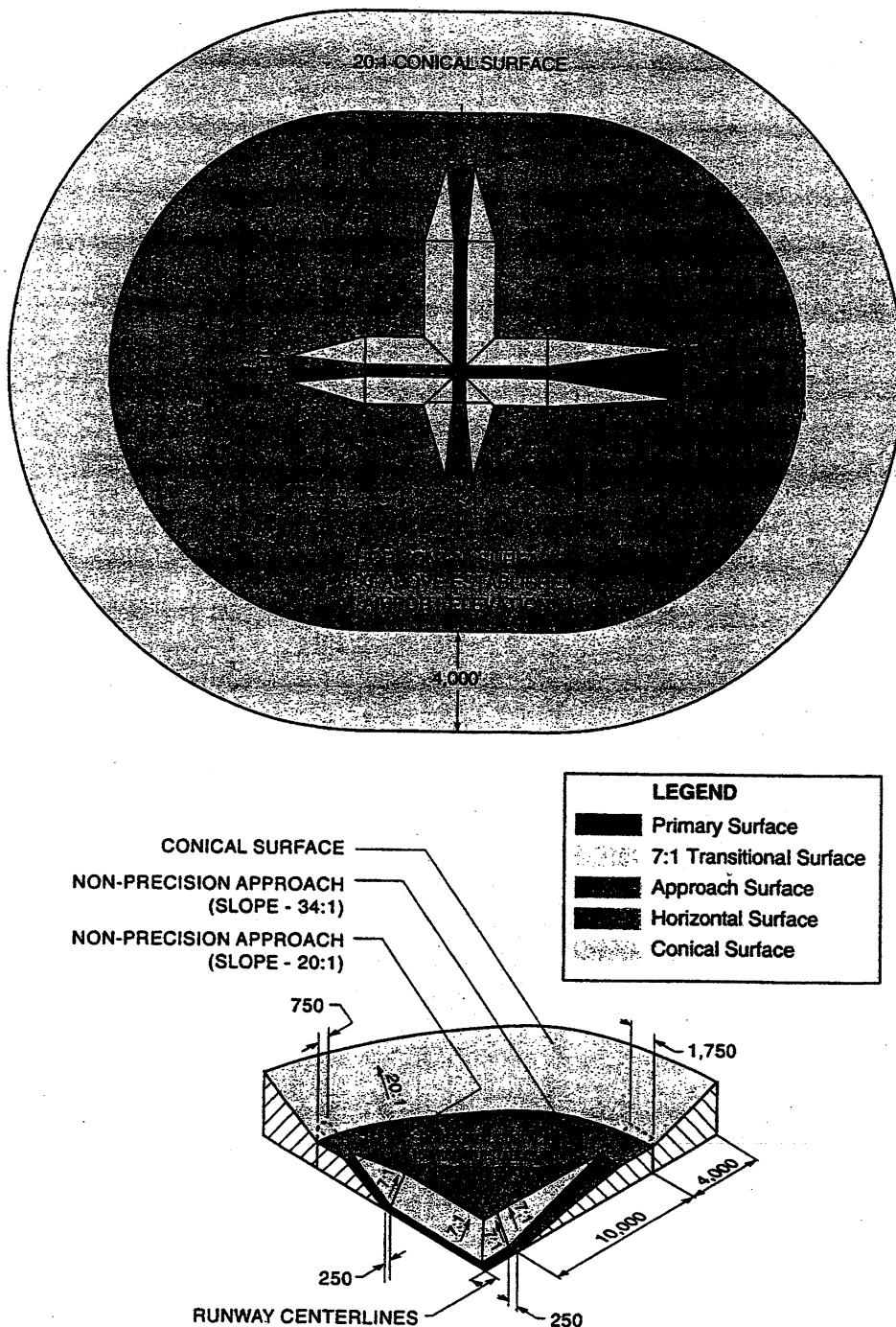
As **Exhibit 2** shows, the TPZ extends some distance beyond the airport. This area corresponds to the general traffic pattern area where frequent aircraft overflights can be expected. It is defined by the F.A.R. Part 77 horizontal surface.

HEIGHT PROTECTION

Tall structures near the airport and off the end of runways can create serious safety problems for aircraft in flight. The State of California has required the consideration of height issues in Comprehensive Land Use Plans to avoid these safety conflicts. Height protection is also important to the Federal Aviation Administration (FAA). FAA has developed a regulation, known as F.A.R. Part 77, defining imaginary surfaces in the airspace around airports. Any structures rising above these imaginary surfaces could be obstacles to safe air navigation.

The Part 77 surfaces at Blythe define a shape that is similar to a bowl or stadium. The edges of the bowl slope upward and outward from the airport. Special surfaces are defined off the

Exhibit 4 - F.A.R. PART 77 IMAGINARY SURFACES



PLAN IMPLEMENTATION

The Riverside County Airport Land Use Commission will implement the Plan. The Commission will review development proposals in the airport influenced area to ensure that they comply with the Plan.

In order to promote quick reviews and decisions on proposed development projects, the Commission intends to coordinate with local development agencies — notably the Riverside County Planning Department. The Commission is encouraging the Planning Depart-

ment to amend the County's Comprehensive General Plan to be compatible with the Comprehensive Land Use Plan in the airport area.

CONCLUSION

The Riverside County Airport Land Use Commission and its staff intend to keep the Plan up-to-date. It is especially important to review the Plan whenever the airport layout plan is amended or a new airport master plan is developed. The Plan also should be reviewed by the Commission and staff whenever experience

indicates that unexpected difficulties are occurring that might be solved through amendments to the Plan. The Commission also should periodically consider the latest authoritative information and research on noise, safety, and height compatibility issues.

The Comprehensive Land Use Plan establishes a basis for protecting Blythe Airport for the benefit of the local area and larger region. The land use standards have been developed to promote airport compatibility while recognizing the need to accommodate appropriately designed urban development near the airport over the long-term future.

For specific information about the details of the Comprehensive Land Use Plan, please contact:

The Riverside County Economic Development Agency, Aviation Division
French Valley Airport Aviation Center
Box 142, 3
37552 Winchester Road
Murrieta, CA 92563
(714) 677-2307

EDA
ECONOMIC
DEVELOPMENT
AGENCY





LETTER "I"

**AIRPORT LAND USE COMMISSION
RIVERSIDE COUNTY**

AUG 12 2002

August 6, 2002

CHAIR

William Cobb
Corona/Riverside

VICE CHAIRMAN

Allen Graff
Hemet

COMMISSIONERS

Paul Bell
Riverside

Walt Snyder
Palm Desert

Ric Stephens
Riverside

Marge Tandy
City of Hemet

Sam Pratt
City of Temecula

STAFF

Keith D. Downs
Executive Director
A.I.C.P., A.A.A.E

5555 Arlington Ave.
Riverside, CA 92504
Tel: (909) 351-0700 x204

Imperial Irrigation District
333 East Barioni Blvd.
P.O. Box 937
Imperial, CA 92251
Attn: Michel D. Remington

RE: NOP Desert Southwest Transmission Project

Dear Mr. Remington:

Thank you for the opportunity to respond to the NOP for your project. In response I have included an Executive Summary of the Comprehensive Land Use Plan for the Blythe Airport. This was adopted in 1993 and will be updated next year. If you wish a full copy of the plan it is available for \$45 at our office or \$50 if you want it mailed.

The Airport Land Use Commission must review any portion of the project within the boundary of the plan. The attached form outlines what needs to be included with your application for review when you have completed the Draft EIR. The assessment needs to compare the criteria of the plan in regards to aeronautical safety, noise and obstructions.

You have included the NOP to Caltrans Aeronautics and I would recommend that you send it to the FAA in Lawndale. You may ultimately need to file a Notice to Construct (7460).


We are looking forward to reviewing the document and rendering any assistance with your project. Please note that our address has changed as indicated on the letterhead.

Page 2
August 6, 2002

Should you have any questions, please contact me at (909) 351-0700 x204.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

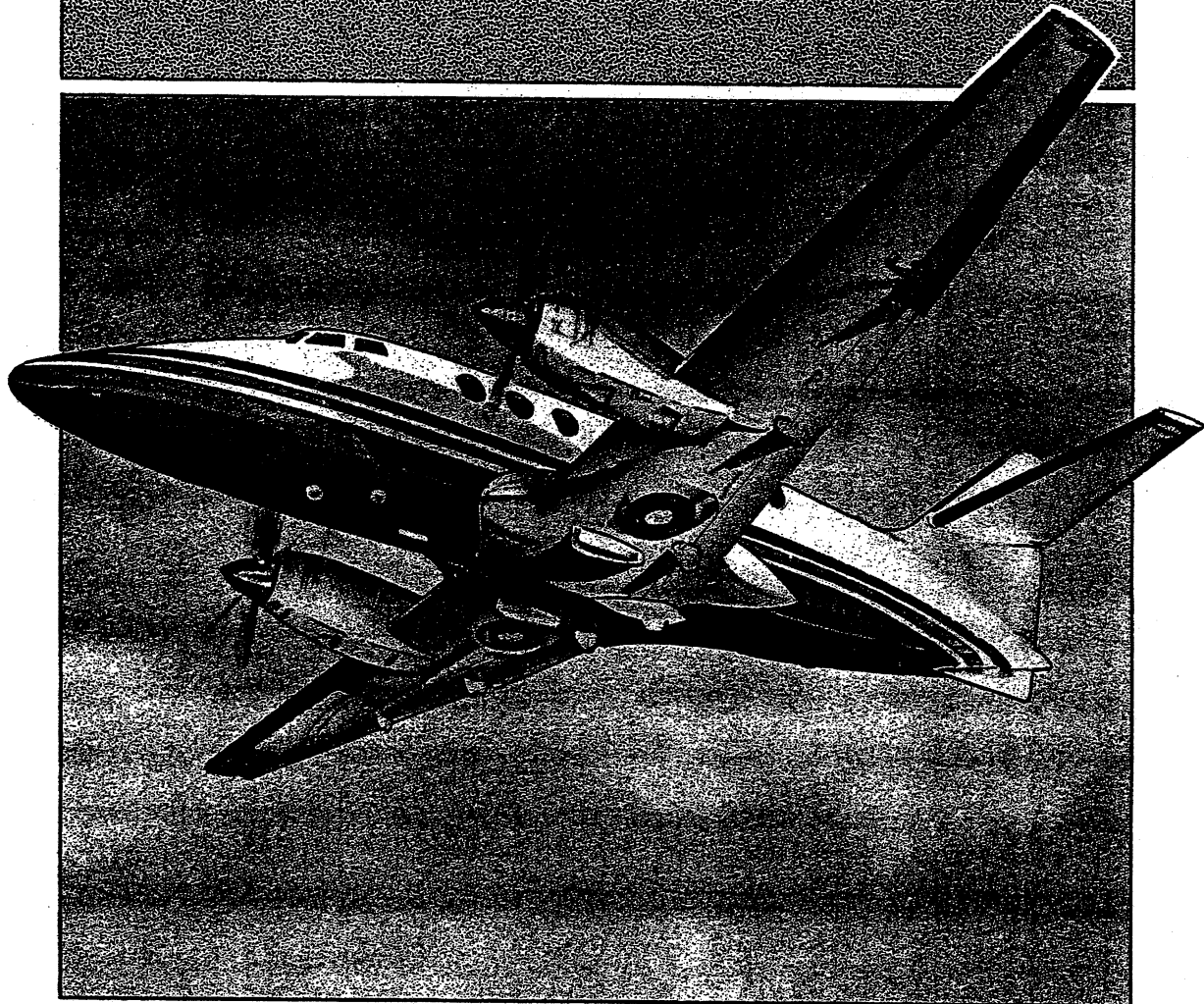


Keith D. Downs, A.I.C.P., A.A.A.E.
Executive Director

KDD:jg

Cc: Charles Hull
Robert Field
Commissioners
Dave Fitz
Ken Brody

Comprehensive Land Use Plan



BLYTHE AIRPORT

Riverside County, California

Prepared for
Riverside County Airport Land Use Commission

EXECUTIVE SUMMARY

PURPOSE OF PLAN

The economic well-being of Southern California depends on good transportation. The public airports of Riverside County are important parts of the County and State transportation systems. If the full economic benefits of aviation are to be realized, an efficient and safe system of airports is a must.

Airports and their environs affect and influence each other. For example, aircraft produce noise which can be a problem for some activities near the airport. On the other hand, some kinds of urban development near airports can create hazards for air navigation. The potential for serious land use problems in the vicinity of airports makes it necessary to plan for the future to avoid conflicts.

The California State Legislature has recognized the importance of protecting the interests of aviation and areas surrounding airports. The legislature has declared that, "It is in the public interest to provide for the orderly development of each public use airport in this state and the area surrounding these airports to promote the overall goals and objectives of the California airport noise standards ... and to prevent the creation of new noise and safety problems."

The legislature has required each county in the state with a public use airport to establish an Airport Land Use Commission. Each Commission is required to develop Comprehensive Land Use Plans for public use airports within the county. Since much of the area around Blythe Airport is either farmland or undeveloped desert, this is a good time to plan for compatible land use for the future.

The Riverside County Airport Land Use Commission was established in 1970. Over the years, the Commission has adopted overall land use planning guidelines for the County's airports. It has also adopted Comprehensive Land Use Plans for some airports. In order to respond to needs which have become evident as these plans and guidelines have been used while also achieving full compliance with state law, the Commission recently has updated its land use planning guidelines and adopted Comprehensive Land Use Plans for all public airports in the County.

BLYTHE AIRPORT

Blythe Airport is in the Colorado River Valley in eastern Riverside County. It is seven miles west of the City of Blythe along Interstate 10. The airport is owned by Riverside County and is operated by the Aviation Division of the County Economic Development Agency.

The airport has two runways and serves general aviation, including recreational and business users, and occasional military aircraft. Approximately 60 aircraft are based on the field, and total annual operations (takeoffs and landings) are estimated at 35,000.

AIRPORT INFLUENCED AREA

The Comprehensive Land Use Plan defines an "airport influenced area" around Blythe Airport. This is the area affected by airport operations and within which potential new development could affect the airport and aircraft in flight. The boundaries of the airport influenced area are shown on

Exhibit 1 - AIRPORT LOCATION

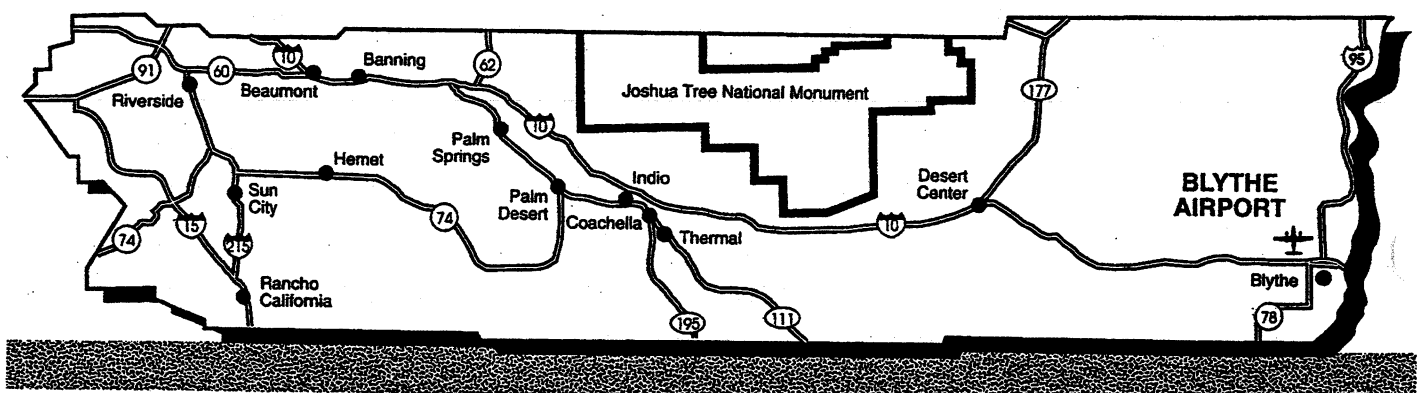


Exhibit 2 on the next page and are discussed in more detail elsewhere in this brochure.

Within the airport influenced area, the Riverside County Airport Land Use Commission exercises its responsibilities under the California Public Utilities Code. In general, these duties involve the review of local general plans, specific plans, and development actions to ensure compliance with the Comprehensive Land Use Plan for the airport.

The airport influenced area includes several different zones. These are based on three types of concerns: noise compatibility, safety, and height protection. The Plan establishes land use standards for each zone. These standards apply only to new development. The Riverside County Airport Land Use Commission has no authority to regulate existing development which may not comply with these standards.

Table 1 - LAND USE STANDARDS FOR NOISE COMPATIBILITY

LAND USE	Community Noise Equivalent Level (CNEL) in decibels				
	60-65	65-70	70-75	75-80	80+
RESIDENTIAL					
Residential, other than transient lodgings					
Transient lodgings	Y	Y			
PUBLIC/INSTITUTIONAL					
Schools, hospitals, nursing homes, churches, auditoriums	Y				
Governmental services	Y	Y	Y*	Y*	
Transportation and parking	Y	Y	Y*	Y*	
COMMERCIAL AND INDUSTRIAL					
Offices, business and professional	Y	Y	Y*	Y*	
Wholesale and retail trade	Y	Y	Y*	Y*	
Communication and utilities	Y	Y	Y*	Y*	
Manufacturing	Y	Y	Y	Y*	
Mining, fishing, resource extraction	Y	Y	Y	Y	Y
RECREATION/OPEN SPACE/ AGRICULTURE					
Outdoor sports arenas	Y	Y	Y		
Outdoor music shells, amphitheaters	Y				
Wildlife exhibits and zoos	Y	Y			
Parks, resorts, camps, golf courses	Y	Y	Y		
Livestock farming and breeding	Y	Y	Y		
Crop raising	Y	Y	Y	Y	Y

NOISE COMPATIBILITY

Aircraft noise has been a problem near many airports in California and the nation. Public awareness of the problem has increased steadily over the past twenty years. In response to public concerns, Congress and the California legislature have adopted various laws and programs since the late 1970s aimed at reducing aircraft noise and promoting compatible land use in noise-affected areas.

Research around the world over the past thirty years has found that the major problems caused by aircraft noise in areas surrounding airports involve the interruption of conversation, TV viewing, sleep, and general

relaxation. While not posing risks of hearing loss or other health problems, these effects can be extremely annoying. Studies have shown that people become increasingly annoyed as total noise exposure increases. Scientists have developed ways of measuring noise to describe total noise exposure. Known as cumulative noise metrics, they allow predictions to be made about the likely response of people to given levels of noise.

The State of California requires the use of the Community Noise Equivalent Level (CNEL) noise metric for airport noise studies. This metric totals all noise occurring over a 24-hour period, adding 5 decibel and 10 decibel penalties for evening and nighttime noise to account for the greater annoyance caused by noise at these times.

KEY TO TABLE 1	
Y (Yes)	Land use is compatible and permitted.
N (No)	Land use is not compatible and not permitted.
Y*	Land use is generally compatible and is permitted if sleeping rooms, offices, and public areas within buildings are treated with sound insulation.

Table 1 shows the Land Use Standards for Noise Compatibility in Riverside County. Residential uses are not compatible with and are not permitted in areas affected by noise above 60 CNEL. Various institutional uses, including schools, hospitals, and nursing homes, are compatible with noise between 60 and 65 CNEL but are not permitted in areas affected by noise above 65 CNEL. Most commercial

LETTER "J"



PLANNING/BUILDING DEPARTMENT
IMPERIAL COUNTY

PLANNING / BUILDING INSPECTION / PLANNING COMMISSION / A.L.U.C.

JURG HEUBERGER, AICP, CEP
PLANNING/BUILDING DIRECTOR

August 8, 2002

Michel D. Remington
Environmental Compliance Section
Imperial Irrigation District
P. O. Box 937
Imperial, CA 92251

AUG 12 2002

SUBJECT: Response to "Notice of Preparation" for the Proposed Desert Southwest Transmission Project -- Blythe to Palm Springs

Dear Mr. Remington:

The Planning/Building Department received on August 6, 2002, your "Notice of Preparation (NOP)" of the joint Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) being prepared by the Imperial Irrigation District (IID) acting as the California Environmental Quality Act (CEQA) "Lead Agency" and the Bureau of Land Management (BLM). The County welcomes the opportunity to comment on the proposed transmission line. The proposed project is the construction, operation and maintenance of a new transmission line from a new substation/switching station north of Hobsonway, west of the Blythe Power Plant and then 118 miles to the existing Devers Substation, Palm Springs.

The proposed new transmission line is to be either a "230-kV or 500-kV" transmission line to meet future IID transmission requests. The NOP indicates that the California Energy Commission (CEC) Report, 2001, provides a long-term demand through 2010 stating "...demand for electrical power in the IID service area will increase at a rate of 20 to 30 megawatts (MW) annually. The report also states that California's peak electricity demand will continue to grow at about two percent per year on average...In addition, IID has received requests for transmission and interconnection service that may utilize the proposed transmission project...Presently, IID's access to the Western Area Power Administration (Western) transmission grid to the northeast is an existing 161-kV transmission line from the existing Blythe Substation to Niland. This existing transmission line is expected to be operating at or near its maximum capacity by the end of 2002...Operating voltages may be either 230-kV or 500-kV. The operating voltage will be based on the results of system studies that are currently underway..."

The deadline for comments is on or about September 5, 2002, and the County staff has some very preliminary comments as follows:

(1) The NOP, as well as the Draft EIR/EIS and Final EIR/EIS, should also be distributed to the following agencies for their review and comment. For example, for "Alternative B" and "Alternative B-1", any impacts to cultural and/or archaeological resources should be reviewed by the IVC Museum and the Southeast Desert Information Center. The environmental document for the proposed "230-kV or 500-kV" transmission line should also be provided to the Commanding Officer of the U.S. Naval Air Facility (NAF) El Centro for impacts to military operations on the two existing targets in the East Mesa area as well as naval bombing activities on the Chocolate Mountain Gunnery Range.

The March Air Reserve Base also needs to be advised of the potential for siting this new transmission line within any low level training routes east of the Niland/Calipatria area.

(2) The "Alternative B" and "Alternative B-1" into Imperial County also involves the possible revision to the Palo Verde Community Area Plan if an IID 230-kV or 500-kV transmission line is to be routed through or around the townsite of Palo Verde to the south and then eastward to the Colorado River. The impacts to the watershed area west of the Colorado River should also be reviewed by the Bureau of Reclamation, Yuma Office, and a copy of all environmental documents should be distributed to that office for their review and comment on potential impacts to federal lands on the Colorado River.

It should be noted that the County's General Plan, Geothermal and Transmission Element, Figure D-2, shows the "Federal Transmission Planning Corridors" and the proposed "Alternative B-1" would be outside of the existing planning corridor and would be inconsistent with the County's General Plan as well as the Bureau of Land Management's, 1980 California Desert Conservation Act (CDCA) Plan as amended.

Appropriate measures to ensure compatibility between the Federal CDCA and County General Plan should be proposed in the Draft EIR/EIS.

(3) The "Alternative B" south of Palo Verde follows the existing "DOE 161-kV Line" and then travels westward to Glamis and then northwest along the Union Pacific Railroad tracks to the "Midway Substation" to hook up to the existing "IID 230 kV Line". The zone is primarily S-2 (Open Space/Recreation) and the height limit for structures is forty (40) feet. A new transmission line above 40' would require a "Variance" and require a "consistency" review by the Airport Land Use Commission.

The consistency, between the "Alternative B" and the County's General Plan, as well as the ALUCP, should be addressed in the Draft EIR/EIS.

(4) The "Alternative B" from the existing DOE 161-kV transmission line to the "Midway Substation" would cross both federal and private lands and could impact threatened, endangered and sensitive plant and animal species and the Draft EIR/EIS should fully assess and provide appropriate mitigation for any significant, adverse impacts to biological resources.

If this alternative is chosen, the County's General Plan would need to be amended to reflect this new transmission line.

(5) The NOP, Project Background section, discusses new generation facilities in Arizona but does not identify any California-based electrical generating facilities that IID would be utilizing in the near to mid-term period.

The Draft EIR/EIS should identify any local sources of energy as discussed in Section 1.4, Alternatives, e.g. "generation alternatives", such as any future development by IID or others of the County's indigenous geothermal energy resource.

(6) The NOP cover letter identifies two "public scoping meetings" in Blythe and in La Quinta which are both outside of Imperial County? Why is there no meeting scheduled in Imperial County if two of the alternatives, Alternative B and Alternative B-1, are wholly within the County?

(7) There are a few mis-prints that should be corrected on your "Distribution List" as follows, e.g. Richard Inman is the Calexico City Manager and not from the "Imperial Valley Association of Governments"; Jurg "Hueberger" should be spelled "Heuberger"; "Glen Miller" is no longer with the Bureau of Land Management, El Centro Field Office.

We look forward to receiving the Draft EIR/EIS and reserve the right to provide additional comments on the BLM/IID environmental document or at any public meeting on the proposed transmission line.

Michel Remington
NOP Response
Page 4 of 4

If you have any questions regarding the above, please contact me at 482-4236, extension 4313.

Sincerely,

JURG HEUBERGER, AICP, CEP
Planning Director

By: *Richard Cabanilla*
Richard Cabanilla
Planner IV

cc: Ann K. Capela, County Executive Officer
Jurg Heuberger, AICP, CEP, Planning Director
Darrell Gardner, Asst. Planning Director
Ralph Cordova, County Counsel
Joanne L. Yeager, Asst. County Counsel
Jay von Werthof, Consultant for IVC Museum
Terry Collins, Southeast Desert Information Center
Randy Rister, County Property Services/ICF&GC
Tim Jones, Director, Public Works Department
Captain Crane, Commanding Officer, NAF/EI Centro
IID Correspondence File
10.109

JH/DG/RC/rs/G:MiscLtr/MichelRemingtonNOPResponse

LETTER "K"

CITY OF BLYTHE

235 North Broadway / Blythe, California 92225
Phone (760) 922-6161 / Fax (760) 922-4938



TO: John Kalish, BLM
FROM: Les Nelson, City of Blythe
SUBJECT: Desert Southwest Transmission Project
DATE: August 15, 2002

Pursuant to the Public Scoping Meeting in Blythe on August 14, 2002, to follow are my comments relative to the proposed Desert Southwest Transmission Project:

- 1.) Regarding alternate routes, alternate B would seem to be the least desirable inasmuch the route is not in a designated utility corridor.
- 2.) As the proposed project involves Imperial Irrigation District (IID), the 230KV (which IID operates) would seem most compatible with existing IID operational capabilities.

Thank you for the excellent presentation, and please include the City of Blythe (my attention) on future mailings concerning the Desert Southwest Transmission Project.

Les Nelson
City Manager

cc: Project File

RECEIVED
BUREAU OF LAND MANAGEMENT
02 AUG 19 PM 3:49
PALM SPRINGS-SOUTH COAST
RESOURCE AREA

LETTER "L"

CITY OF BLYTHE

235 North Broadway / Blythe, California 92225
Phone (760) 922-6161 / Fax (760) 922-4938



August 15, 2002

Bureau of Land Management
Attn: Mr. John Kalish
P.O. Box 581260
Palm Springs, California 92258

Re: Desert Southwest Transmission Project

Dear Mr. Kalish:

Thank you for the opportunity to comment on the above project at your Blythe Public Scoping Meeting last night. As the Blythe Airport Manager my comments relative to the transmission line in proximity to the airport is that the line leave the Blythe Energy/substation site(s) in the most expeditious southerly manner possible. I understand the Caltrans Division of Aeronautics and Federal Aviation Administration have both been contacted relative to this work with no adverse comments received.

Additionally, with the local cropduster operations in the area and termination of the line under the Airport Traffic Pattern I would certainly like to see the shortest possible poles or towers used within two miles of the airport. Finally, visibility spheres, or multiple sets mid-span between towers should be incorporated into and maintained to enhance pilot awareness of wire presence.

If you should wish to contact me directly about this matter please don't hesitate to call me directly at (760)921-2740.

Sincerely,

Charles Hull,
Assistant City Manager

cc: Keith Downs, ALUC

RECEIVED
BUREAU OF LAND MANAGEMENT
02 AUG 19 PM 3:50
PALM SPRINGS-SOUTH COAST
RESOURCE AREA

Sep 16 02 04:56p

Sep 16 02 01:20p

CITY OF BLYTHE

760 LETTER "M"



CITY OF BLYTHE

DEVELOPMENT SERVICES DEPARTMENT
235 North Broadway - Blythe, California 92225

Phone (760) 922-6130
FAX (760) 922-6334

September 5, 2002

To: Michel D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
P.O. Box 9378
Imperial, Ca. 92251

From: David James Padres
Associate Planner

Re: Desert Southwest Transmission Project

Dear Mr. Remington,

As a follow-up to my attendance at the Public Scoping meeting on the proposed Desert Southwest Transmission Project, I am presenting my comments on the subject project. One potential scenario identified at this meeting was for a substation to be installed in the immediate vicinity of the Blythe Energy I and (proposed) II projects.

If this case, the City would have the upmost concern that a) a landscaping plan and b) an exterior color plan be developed that mitigates the potentially negative visual impact of the substation. Both plans should strive to harmonizes with the exterior color and landscape requirements placed on the Blythe Energy projects.

Given the strategic visual location of both the Blythe Energy I and (proposed) II Projects within the Palo Verde Valley, the Planning Department is extremely concerned that these projects as well as the Desert Southwest Transmission Project's proposed substation- visually harmonizes with the surrounding environment. This is of paramount importance in preserving the pristine image of the Valley, which directly impacts the present and future economic potential of the local economy.

I may be contacted at 760922-6130 extension 224. I am very appreciative of the opportunity to comment on this project.

Sincerely,

David James Petritz
Associate Planner



ESTABLISHED IN 1918 AS A PUBLIC AGENCY

LETTER "N"

COACHELLA VALLEY WATER DISTRICT

POST OFFICE BOX 1058 • COACHELLA, CALIFORNIA 92236 • TELEPHONE (760) 398-2851

DIRECTORS
JOHN W. McFADDEN, PRESIDENT
RUSSELL KITAHARA, VICE PRESIDENT
TELLIS CODEKAS
PATRICIA A. LARSON
PETER NELSON

September 5, 2002

OFFICERS
THOMAS E. LEVY, GENERAL MANAGER-CHIEF ENGINEER
JULIA FERNANDEZ, SECRETARY
STEVEN B. ROBBINS, ASSISTANT GENERAL MANAGER
REDWINE AND SHERRILL, ATTORNEYS

File: 0141.

Michel Remington
Imperial Irrigation District
Post Office Box 937
Imperial, California 92251



Dear Mr. Remington:

Subject: Comments on the Desert Southwest Transmission Project

We have reviewed the Revised Notice of Preparation of a Draft Environmental Impact Report/Environmental Impact Statement for the Imperial Irrigation District's Desert Southwest Transmission Project as requested in your notice of preparation.

The U.S. Army Corps of Engineers is currently in the design stage of the Thousand Palms Flood Protection Project. This project consists of a system of levees to collect flow and protect approximately 2,800 acres of land from flooding as shown on the enclosed map.

It appears that the proposed Desert Southwest Transmission Project would be located in close proximity to the Thousand Palms Flood Protection Project and the Coachella Canal Lining Project from Niland to Mecca.

We have no further comments at this time regarding this project.

Please provide copies of the Draft Environmental Impact Report to this district and the U.S. Army Corps of Engineers, Los Angeles office, when available.

If you have any questions please call Dan Charlton, stormwater engineer, extension 316.

Yours very truly,

Tom Levy
General Manager-Chief Engineer

Enclosure/1/as

DC:ddheng/sw/aug/remington

TRUE CONSERVATION
USE WATER WISELY



COACHELLA VALLEY WATER DISTRICT
Post Office Box 1058
Coachella, California 92236

____ GM-CE
____ Asst. GM
____ Asst. to GM
____ Originator
____ File

FACSIMILE TRANSMITTAL INFORMATION SHEET

File: 0141

Name MICHEL REMINGTON

Firm IMPERIAL IRRIGATION DISTRICT

City IMPERIAL, CA 92251

Telecopier No. (760) 482-9896 or Speed Dial No. _____

From DAN CHARLTON Authorized by [Signature]

Total number of pages sent (including transmittal) 2

____ Please review and call

Original to follow by mail

☒ Per your request

☒ Yes ☐ No

____ For your information

Remarks: PLEASE FIND ENCLOSED COMMENTS ON
THE DESERT SOUTHWEST TRANSMISSION PROJECT.

If you do not receive all pages or they are not legible, please call as soon as possible.

Telephone (760) 398-2651

Ask for TERRI

Date 9/9/02 Time 4:38

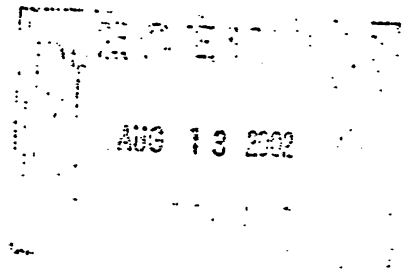
150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (760) 482-4606
FAX: (760) 353-9904

AIR POLLUTION CONTROL DISTRICT

August 8, 2002

Michel D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
P.O. Box 937
Imperial CA. 92251



Re: Desert Southwest Transmission Project

Dear Mr. Remington:

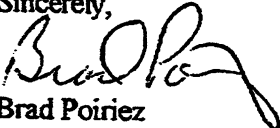
This letter is to inform you that the Imperial County Air Pollution Control District (ICAPCD) is in receipt of the Notice of Preparation (NOP) of draft EIR/EIS to assess the environmental effects for the new transmission line project named - Desert Southwest Transmission Project.

Section 1.3 of the NOP titled Probable Environmental Effects of the Proposed Project has a component for Air Quality. The ICAPCD looks forward to reviewing the temporary and cumulative air quality impacts from this project and with other planned air emission sources.

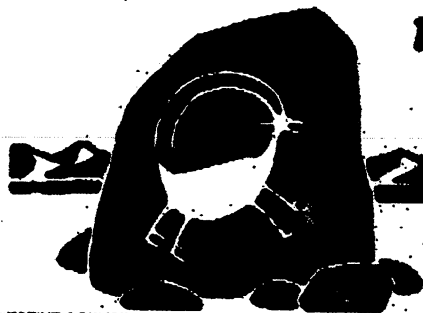
After an initial review of the Section 1.4 Alternatives of the NOP, the ICAPCD feels there will be minimal, if any, impacts to Imperial County if either Alternative A or C is chosen for this project due to their location. However, Alternative B may have impacts to Imperial County.

Once again, the ICAPCD anticipates making a formal review once we are in receipt of the draft EIS/EIR. Should you have any further questions feel free to contact me at 760-482-4606.

Sincerely,


Brad Poiriez
Senior Manager

cc: Stephen L. Birdsall, APCO
Jurg Heuberger, Planning/Building Director
Reyes Romero, Deputy APCO



THE DESERT PROTECTIVE COUNCIL INC.

A NON-PROFIT ORGANIZATION

P.O. BOX 3635 • SAN DIEGO • CALIFORNIA 92163-1635

www.dpcinc.org

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SYLVIA BROADBENT
Professor of Archaeology

GEORGE W. COX
Conservation Ecologist

MYE DANGERMOND
Park Consultant

BETTY FORGEY
Desert Tortoise Activist

MICHAEL FROME
Author

AUGUST FRUGE
Conservationist

LARRY IWERKS
Wilderness Advocate

WILBUR MAYHEW
Professor of Zoology

ART MONTANA
Professor of Earth Sciences

ALLAN MUTH
Ecologist

KAREN SAUSMAN
Recreation Director

ROBERT STEBBINS
Herpetologist

LEONARD VINCENT
Professor of Biology

HOWARD WILSHIRE
Geologist

Mr. Michael D. Remington
Imperial Irrigation District
Imperial, California
VIA Fax (760) 482-9896
August 26, 2002

Re: Desert Southwest Transmission Project

Dear Mr. Remington,

The Desert Protective Council thanks you for extending the comment deadline until September 15, 2002 for comments on the Desert Southwest Transmission Project.

I am writing to you to formally request that the Imperial Irrigation District, as the lead agency on this project, schedule another Public Scoping Meeting in El Centro or Imperial, California during the first two weeks of September. I have polled some of our Imperial County DPC members and other interested parties. There is interest in learning more about the project and the proposed alternatives and in submitting scoping comments in the format of a public meeting.

Thank you very much for giving us the opportunity to submit this request. We appreciate your taking a lead in involving a larger segment of the desert community in this project by conducting another public meeting in a convenient location in the Imperial Valley.

I look forward to hearing from you on a date and time, and to meeting you in person. Thank you again.

Sincerely,

Terry Weiner
Terry Weiner

Conservation Coordinator
Desert Protective Council
Phone: (619) 543-0757
Fax: Same number

To safeguard for wise and reverent use by this and succeeding generations those desert areas of unique scenic, scientific, historical, spiritual and recreational value, and, to educate children and adults to a better understanding of the deserts.

LETTER "P"



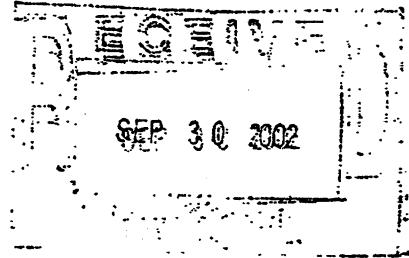
RECEIVED
BUREAU OF LAND MANAGEMENT

02 SEP 13 AM 11: 02

PALM SPRINGS-SOUTH COAST
RESOURCE AREA

Michael R. Montoya
Director
Project Management
(626) 302-1445 - Office
(626) 302-9449 - Fax

September 12, 2002



Diane Gomez
Bureau of Land Management
P.O. Box 581260
690 West Garnet Avenue,
Palm Springs, CA 92258

Subject: Imperial Irrigation District, Desert Southwest Transmission Project; Federal
Register Notice CA-660-1430-ER-CACA-44491

Dear Ms. Gomez:

The August 13, 2002 Federal Register published a Bureau of Land Management (BLM) Notice of Proposed Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Imperial Irrigation District's (IID) Proposed New California Desert Southwest Transmission Line Project (Project). The Notice requests written comments for incorporation of issues into the EIS/EIR to be prepared jointly by BLM and IID. This letter constitutes the initial comments of Southern California Edison (SCE) for this Project and a list of issues that the BLM and IID should include within the joint EIS/EIR. SCE requests that the BLM and IID add SCE to the mailing list for the Project and keep SCE fully informed about the Project as the BLM permitting and environmental review process progresses.

By the way of background, SCE has existing facilities along or near the alignment¹ proposed by IID for the Desert Southwest Transmission Project. These facilities include but are not limited to: Devers - Palo Verde 500 kV; Devers - Mirage 230 kV; Devers - Capwind - Concho - Mirage 115 kV; Devers - Eisenhower; Devers - Coachella 115 kV; and Blythe - Eagle Mountain 161 kV transmission lines. SCE also has existing rights-of-way in this area, some of which are wide enough to accommodate additional transmission facilities to meet SCE's obligations to provide reliable electric service to our customers.

For example, SCE is currently evaluating the need for a second transmission line within the Devers - Palo Verde No. 1 right of way alignment, the Devers - Palo Verde 500 kV No. 2 project. As the BLM is aware, SCE is currently performing environmental studies for Devers - Palo Verde 500 kV No. 2 project.

1 For the purposes of this letter, SCE's use of the term "alignment" is in reference to IID's proposed transmission line path for the Desert Southwest Transmission Project and does not assume that the path is within the existing BLM Utility Corridor.

Southern California EdisonSeptember 12, 2002

Federal Register Notice CA-660-1430-ER-CACA-44491

The following items need to be taken into account in the BLM's consideration of IID's proposed Project.

1. The BLM has engaged in a substantial amount of work defining utility corridors across BLM property. Entitlements for the use of those utility corridors must be fully evaluated to determine if the IID Project can be accommodated with the existing utility corridors. Expansion outside existing corridors by IID could create environmental impacts and disrupt the existing utility corridor plans. Construction within the corridor could adversely impact existing right-of-way entitlements. For example, the Project should not infringe upon (i) the ability of SCE to operate and maintain its existing transmission facilities, and (ii) SCE's existing rights along the Devers - Palo Verde right of way, including future SCE transmission facilities, such as the Devers - Palo Verde No. 2 transmission line.
2. The EIS/EIR must evaluate the impact the Project will have on existing and other proposed utility corridor uses.
3. The EIS/EIR must consider the consultation that will occur between IID and SCE to develop the appropriate design and construction criteria for the Desert Southwest Transmission Project. These criteria will be developed to avoid adverse impacts to SCE's existing and proposed transmission lines. The criteria may influence the scope, location, and structure of the IID Project facilities, which in turn must be evaluated for environmental effects.
4. The BLM should include the Western Electric Coordinating Council (WECC) as a coordinating agency under NEPA and seek WECC comments regarding the Project. The WECC has prepared a Progress Report Policies and Procedures document, dated May 21, 2002, that should be considered in the EIS/EIR. In addition, the BLM should also consider the WECC rating for the Southwest Transmission Project, as outlined in the WECC Procedures for Regional Planning Project Review and Rating Transmission Facilities document, dated December 2001.
5. Because the California Independent System Operator (CAISO) has jurisdiction over transmission line operation in the state of California, they may have requirements that ultimately influence the project scope. Therefore the BLM and IID should also include CAISO as a cooperating agency for the EIS/EIR.
6. The EIS/EIR must consider the potential impact to all transmission line crossings of SCE facilities, including but not limited to Devers - Palo Verde No. 1, the potential Devers - Palo Verde No. 2, and Blythe-Eagle Mountain transmission lines.
7. The EIS/EIR must consider all elements of construction related to the Project, including any SCE transmission system upgrades to support an interconnection of IID's proposed Project with SCE's transmission system. For example, if the Devers substation must be expanded to accommodate the IID Project, then BLM must consider that expansion in the EIS/EIR.

Southern California EdisonSeptember 12, 2002

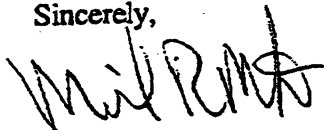
Federal Register Notice CA-660-1430-ER-CACA-44491

IID and SCE representatives have not met regarding the IID Project. Therefore, SCE's knowledge about the Project is limited by the information contained in the BLM notice. As has been suggested, SCE would like to meet soon with the BLM and IID to obtain more details about the Project. SCE may have additional information concerning Project impacts to submit to BLM and IID after that meeting.

SCE requests that copies of all environmental documentation related to the Desert Southwest Transmission Project be provided to SCE. SCE would like to thank the Bureau of Land Management for this opportunity to comment on the proposed project and to re-emphasize that the Desert Southwest Transmission Project must not infringe upon SCE's existing rights for the proposed Devers - Palo Verde No. 2 transmission project.

If you have any questions regarding SCE's concerns, please contact me at 626-302-1445 or Marco Ahumada at 626-302-4404.

Sincerely,



Michael Montoya
Director of Project Management
Southern California Edison
2131 Walnut Grove Ave.
Rosemead, CA 91770

Cc: Jessie Silva, Imperial Irrigation District
Ken Lewis, California Public Utilities Commission
Tom French, California Independent System Operator
Bob Dintelman, Western Electric Coordinating Council
John Kalish, Bureau of Land Management
Douglas Proctor, Desert Southwest Transmission Project

Southern California Edison

September 12, 2002

Federal Register Notice CA-660-1430-ER-CACA-44491

Bc: Tom Burhenn
Robert Lopez
Mary Drury
Daniel Pearson
Richard Tom
Pat Mayfield
Dana Cabbell
Jerry Amalfitano
Andrew Wiederin
Michael R. Montoya
A. Larry Grant
Kathleen Derosa
David Barreira
Ray Turner
Wes Williams
Devers – Palo Verde Project File

LETTER "Q"

Doran Sanchez

08/16/02 01:37 PM

To: John Kalish/CASO/CA/BLM/DOI@BLM, Casey
Gomez/LCFO/NM/BLM/DOI@BLM

cc:

Subject: Power Lines Comment

— Forwarded by Doran Sanchez/CASO/CA/BLM/DOI on 08/16/2002 01:33 PM —



"cemone"

<cemone@humboldt1
.com>

08/15/2002 09:07 AM

To: <dasanche@ca.blm.gov>

cc:

Subject: Power Lines Comment

It astounds me that any government agency, from the BLM to the Imperial Irrigation District, would spend money to TRANSPORT electricity to the desert, where the sun shines almost interminably (except at night!). I think, therefore, that the BLM should refuse to encourage the use of fossil fuels and encourage the installation of solar panels near the site of use by refusing to cooperate with this project. Please forward these comments.

C. E. Mone

Box 223

Trinidad, CA 95570-0223

P. S. I also think that accepting only comments written on paper and transported by truck or plane is another waste of our resources and that is why I am sending this by email, using only a small amount of electricity.

9-20-02

COMMENTS ON THE IID DESERT SOUTHWEST TRANSMISSION LINE PROJECT.

The opportunity to comment on the IID project is deeply appreciated, especially at the extra scoping session scheduled in El Centro on September 11, 2002. Hearings at Blythe and La Quinta are far distance from San Diego where many people are concerned about what happened to the Colorado Desert.

The IID project seems to address an array of transmission lines, substations and inter-connecting facilities. To comment on each and every sector of the IID Desert Southwest Transmission Line Project is an impossible task. The IID is seeking markets and demands; the configuration of options and Alternatives would enable IID to move quickly, and, without further environmental review.

MY SPECIFIC COMMENTS ADDRESS THE FOLLOWING ITEMS:

There appears to be a proliferation of options for new switching/substations, a variety of connecting lines with kVs ranging from 92 - 500, and, unknown service areas/demands.

If LNG is required or already exists for a power source for the substations and/or IID facilities, the issues of source, truck or pipeline transport and safe storage must be analyzed in the Draft EIS/EIR. See attachment A and B.

The list of impacts does not seem to address the issue of the transmission line crossing or adjacent to MWD's Hayfield ground storage area just east of Desert Center, or the businesses, residents or agencies along the way, such as the wind farms along I-10.

Maps of designated state and federal protected areas (including USFWS critical habitat overlays) are conspicuously missing from the maps and photographs (displayed 9-11-02). Also missing from the maps are IID existing and proposed facilities south from the Project area to the Mexican border (and/or beyond).

The Draft EIS/EIR should include IID's existing capacities and facilities (including the aqueduct-power installations), kVs and tower structures as well as routes.

It would be helpful if BLM and or the Desert Managers Group could make available a map for public reference of all of the power/energy transmission lines across the California desert, from the coastline to beyond the Colorado River and from the north to the Border. I know it is impossible to include such information in the EIS for this IID Project, but let us not be wiped out by transmission corridors everywhere.

Finally, the IID should identify one route for the Desert Southwest Transmission Line Project to be published in the Draft EIS/EIR. I will be privileged to comment in detail.

Please keep my name on the mailing list for this and other IID projects.

Respectfully

Harriet Allen
3750 El Canto Drive
Spring Valley, CA 91977

c: BLM/Palm Springs



Pro Peninsula News Noticias de Pro Peninsula

Vol. 1, No. 3 - Summer 2002

Focus: Liquid Natural Gas in Baja California

by Chris Pesenti

Think back to summer of the year 2001. For myriad reasons, too lengthy to address here, Californians experienced firsthand their state's vulnerability to energy supplies. Through conservation undertaken by business and individuals alike, the state was able to avert crisis. Meanwhile, many energy forecasters are predicting tremendous growth in the region's demand for energy, especially when northern Baja California and the rapid expansion of its population and industry is included in the equation.

Energy companies have been quick to react to this perceived demand with numerous proposals for development of energy capacity along the border. Currently, five multinational energy companies have proposed development of Liquid Natural Gas (LNG) regasification terminals in mostly pristine stretches of the northern Baja California coastline.

What is LNG?

LNG is natural gas that has been highly compressed at extremely cold temperatures to the point that it becomes a liquid. This process makes transportation of the gas from its extraction site (often on another continent) to receiving terminals economically feasible. The LNG is then regasified at these terminals (closer to the point of demand) at high temperatures and piped out.

Why Baja California?

Putting these LNG terminals in northern Baja California would bring the gas closer to a point of high demand. A 1978 California Coastal Commission study (California Coastal Commission Offshore LNG study, 1978) of LNG plants found massive conflicts between construction of coastal LNG facilities and the state's natural and marine resources, and the public's use of these resources. The study produced a list of 31 conditions for consideration of any proposed LNG plant. To date, no LNG plant has been built in California. Until recently Baja California lacked any such regulatory structure for LNG plants, making the region an attractive destination for energy companies.

(Continued on page 2)

Infoque: Gas Natural Licuado en Baja California

por Chris Pesenti

Recuerde el verano del año 2001. Por motivos innumerables, demasiado largos y delicados para nombrarlos aquí, los californianos experimentaron la vulnerabilidad de su estado en cuanto a provisiones de energía. Gracias a la conservación organizada tanto por negocios como por individuos, el estado fue capaz de prevenir la crisis. Mientras tanto, muchos analistas de energía predicen un crecimiento enorme en la demanda de energía de la región, sobre todo cuando el norte de Baja California y la rápida expansión de su población y de su industria esta envuelta en este asunto.

Las empresas de energía reaccionaron rápidamente para hacerse frente a esta notable demanda con numerosas propuestas para el desarrollo de capacidad de energía a lo largo de la frontera. Actualmente, cinco empresas de energía multinacionales han propuesto el desarrollo de "Gas Natural licuado" Liquid Natural Gas (LNG) terminales de nueva gasificación sobre todo en los primeros periodos de la costa fronteriza del norte de Baja California.

¿Qué es el GNL?

El GNL es el gas natural que ha sido comprimido a temperaturas sumamente frías hasta el punto que se hace líquido. Este proceso hace el transporte del gas desde su sitio de extracción (a menudo en otro continente) hasta los terminales le recibo económicamente factibles.

Al llegar al terminal, (más cerca del punto de demanda) el GNL es gasificado de nuevo por el uso de temperaturas altas y conducido por tuberías a la pipa de gas para la distribución.

¿Por qué Baja California?

Al poner estos terminales de GNL al norte de Baja California situaría el gas muy cerca de un alto punto de demanda. La Comisión Costera de California realizó un estudio en 1978 (Comisión Costera de California estudio de GNL en el exterior, 1978) referente a las plantas de GNL, encontrando conflictos masivos entre la construcción de instalaciones de GNL costeras, los recursos naturales y marítimos del estado, y el empleo del público de estos recursos. El estudio arrojó una lista de 31 condiciones para la consideración de cualquier planta de GNL propuesta. Hasta el momento, ninguna planta de GNL ha sido construida en California. Hasta hace poco no había una estructura reguladora para plantas de GNL en Baja California, haciendo la región un destino atractivo para empresas de energía.

(Continuado, página 2)

Pro Peninsula

P.O. Box 717

San Diego, CA

9216

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info@propeninsula.org

www.propeninsula.org

Pro Peninsula is a 501(c)(3) organization dedicated to strengthening the environmental movement on the Baja California peninsula.

Not yet a Pro Peninsula Member?

Fill out and return the enclosed envelope along with your membership contribution and stay informed with quarterly updates on environmental issues on the peninsula.

This Issue:

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LNG - A Potential Threat to Baja California's Cultural and Historical Resources •3

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Organizational Profile: ICMME •4

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Announcements •6



Pro Peninsula News • Noticias de Pro Peninsula

2

Focus: Liquid Natural Gas in Baja California (Continued from page 1)

What are the risks?

The environmental impacts are considerable. Baja California is home to some of the last continuous stretches of coastal sage scrub, which grows in a climate zone found only five locations throughout the world. One of the sites proposed for LNG development is Costa Azul, located along the northern coast of Baja California and falling within one of these rare climate zones. Development of one or more plants would have a tremendous impact on this fragile ecosystem. This coastal habitat is currently home to two endangered species, the Ferocactus and the Crotalo rubus. According to Claudia Leyva, of the Universidad Autónoma de Baja California, these geographically isolated zones are high in both biodiversity and endemic species. Unfortunately, she states they are so highly vulnerable to fire, one of the principal risks associated with LNG facilities. Apart from construction of the plant itself, regulations would most likely require maintenance of a safety buffer zone of several kilometers around the site, leaving this land off limits to public use.

Apart from environmental impacts, there are considerable risks to human life involved with LNG regasification facilities. These include the potential loss of life and skin burns resulting from an onsite fire or the ignition of a dispersed vapor cloud resulting from malfunction or accident (CCC, 1978). The mayor of Rosarito and governor of Baja California have both rejected proposals for sites located near the city of Rosarito due to the perceived risk to human life.

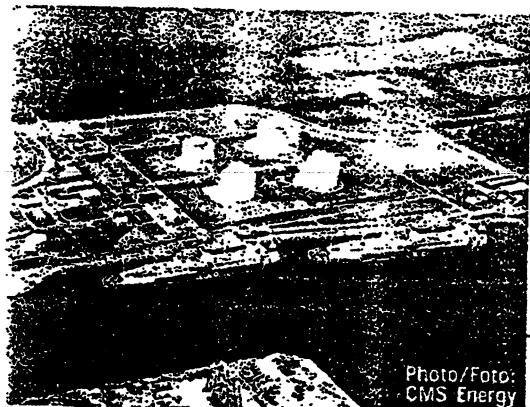
Who are the companies involved?

Currently, five companies have submitted proposals: Chevron/Texaco, El Paso, Marathon, Sernpra, and Shell.

What is Pro Peninsula doing?

Pro Peninsula has joined a coalition consisting of Baja California environmental groups, local business interests, industry experts, and University representatives who have come together to take a unified environmental stance on the issue, present a cohesive front for negotiations with the industry, and to represent affected communities in the region.

The information for this article was compiled from: "Energy Companies Propose Building Liquefied Natural Gas Terminals Along the Baja Coast," by Mark Spalding, Right Bulletin, Spring 2002, No. 4, and "Assessment of Potential Risk Associated with Location of LNG Receiving Terminal Adjacent to Bajaruar and Feasible Alternative Locations," Bill Powers, P.E., Powers Engineering, June 1, 2002.



Photo/Foto:
CMS Energy

Enfoque:

Gas Natural Licuado en Baja California

(Continuado de página 1)

¿Cuáles son los riesgos?

Los impactos ambientales son considerables. En Baja California se ubican algunas de las últimas ininterrumpidas extensiones de sabia costera, que crece en una zona aclimatada que sólo se encuentra en cinco lugares en todo el mundo.

Uno de los sitios propuestos para el desarrollo de GNL es Costa Azul, localizada a lo largo de la costa del norte de Baja California y la cual cuenta con estas condiciones climáticas. El desarrollo de una o más plantas tendría un impacto enorme sobre este frágil ecosistema. Este hábitat costero es actualmente el sitio donde viven dos especies en peligro de extinción, el Ferocactus y el Crotalo rubus. Según Claudia Leyva, de la Universidad Autónoma de Baja California, estas zonas geográficamente aisladas cuentan con una cantidad muy alta con respecto a la diversidad biológica y el número de especies endémicas.

Lamentablemente, ella declara que ellos también son sumamente vulnerables para resistirse a las quemaduras, uno de los principales riesgos asociados con instalaciones de GNL.

Aparte de la construcción misma de plantas, muy probablemente las regulaciones requerirán el mantenimiento de una zona de seguridad de varios kilómetros alrededor del sitio, dejando esta tierra sin demarcaciones para el uso público.

Además de los impactos ambientales, hay riesgos considerables para la vida humana en lo referente a la instalación de una gasificación de GNL. En estos se incluye la pérdida potencial de vida y quemaduras de la piel que pueden ser resultado de fuego local o la combustión de una nube de vapor dispersa que a su vez es la consecuencia del mal funcionamiento o de un posible accidente (CCC, 1978). El alcalde de Rosarito y el gobernador de Baja California han rechazado propuestas para la ubicación de una planta de GNL cerca de la ciudad de Rosarito debido al riesgo percibido a la vida humana.

¿Cuáles son las empresas involucradas?

Actualmente, cinco empresas han sometido ofertas: Chevron/Texaco, El Paso, Marathon, Sernpra, y Cáscara.

¿Qué está haciendo Pro Peninsula?

Pro Peninsula ha unido una liga que incluye grupos ambientales de Baja California, negocios locales interesados, expertos de la industria, y representantes de la Universidad, quienes nos hemos unido para tomar una postura unificada ambiental sobre este tema, sirviendo como frente para negociaciones con la industria, y para representar comunidades afectadas en la región.

La información para este artículo fue compilado de: "Energy Companies Propose Building Liquefied Natural Gas Terminals Along the Baja Coast," by Mark Spalding, Right Bulletin, Spring 2002, No. 4, y "Assessment of Potential Risk Associated with Location of LNG Receiving Terminal Adjacent to Bajaruar and Feasible Alternative Locations," Bill Powers, P.E., Powers Engineering, June 30, 2002.

Liquefied Natural Gas Receiving Facility Lake Charles, Louisiana

Instalación de Gas Natural Licuado
Lake Charles, Louisiana

A+ B

SOURCE: 'The Jewel of Oxnard'

Coast and Ocean
Volume 18, Number 2
Summer, 2002

A quarterly of the Coastal Conservancy
1330 Broadway, 11th Floor
Oakland, CA 94612

Re LNG

heated, regassified, and piped into the natural gas delivery system.

Natural gas is a clean-burning fuel, and many of California's non-nuclear power plants use it, receiving it as a gas by pipeline. When compressed into a liquid state, however, it must be treated with extreme care: when it gets into air it vaporizes, spreads quickly, and is extremely flammable. A large accidental release into the atmosphere could create a plume that might ignite, burn back to the storage tanks, and cause a major conflagration, killing thousands of people.

Occidental Petroleum argued that the chances of any such accident were so negligible as to be almost nonexistent. Bill Ahern, energy analyst for the Consumers Union, agreed with this assessment. The trouble is, he said, if a worst-case accident were to occur, the consequences would be truly catastrophic.

Jane Tolmach, then a member of the Oxnard City Council, was among those who had gone to great lengths to check out assurances that there was no hazard when the LNG facility was first proposed. She canceled a vacation to Greece and, instead, traveled to Japan to see an LNG terminal that the proponent of the Oxnard terminal said was comparable and a model of safety. She found major differences: that facility was on Tokyo Bay, not on the open ocean, and it received tankers far less frequently than was proposed for Oxnard. "This is a rough, windy coast," Tolmach pointed out, and Oxnard is downwind. Accidents do happen here. This year, during an air show, two planes flown by experienced pilots crashed in nearby duck club preserves—less than a mile from the proposed LNG site.

Now people's awareness of the hazard is even greater. "Putting an LNG plant in this location [between a naval base and a deep-water port] is like putting a bull's-eye between two bases for terrorists to knock out," William L. Terry, who lives within a mile of Ormond Beach, argued to the Coastal Conservancy.

Tolmach and others who had been involved in the earlier LNG protest got ready to pull files down from their attics. Meanwhile, Armbrust recalled that "for many people in this community, the LNG fight put Ormond Beach on the map." Activists began to consider how Occidental Petroleum's plans might help save Ormond Beach.

The Conservancy was to meet in Monterey on Thursday, May 23, eight days before its right of first refusal was to expire. If it approved the purchase, one more step was needed: approval by the California Public Works Board, which was to meet the following Tuesday. The decision would be difficult. Not only was the purchase price of \$9.7 million more than twice the price Edison had agreed to, but Occidental Petroleum had agreed to far more liability for unforeseen hazards than Edison had proposed.

To encourage both agencies toward boldness, advocates turned to the media. Hiring professional help, they produced a radio ad and on May 17 staged a rally and press conference at the beach. "It all had to be done very hastily," said Armbrust. Assembly members Fran Pauley and Hannah-Beth Jackson came and spoke in front of TV news cameras, as did Oxnard's mayor, Manuel Lopez, three county supervisors, actor Beau Bridges, and others. Participating environmental groups included the Sierra Club, Surfrider Foundation, and the Environmental Defense Center. Mati Waiya, executive director of Ventura CoastKeeper and the Wishtoyo Foundation, a Native American organization, wore Chumash regalia as he conducted a prayer ceremony. "The media blitz helped the critical mass to come together," said Armbrust.

Among those who appealed for purchase at the Conservancy meeting were John Flynn, president of the Ventura County Board of Supervisors, and Supervisor Kathy Long. Mayor Lopez sent a plea through a delegate. Elderly veterans of other coastal battles were present, and younger people too. "If the pelicans could come up and speak, or the birds, or the red-legged frogs, or the plants, they would be here," said Mati Waiya. "But you're here. Don't disappoint the elder women who dedicated their lives to this. Be the warriors that you are. Conservancy, this council that represents the people. Let the children benefit. Protect our past."

Bill Boyer, representing Occidental Petroleum, spoke briefly, saying that Ormond Beach was the optimal site for an LNG terminal in California, that only the 95-acre site of Edison's storage tanks would be developed, that there would be "minimal environmental impact," and that public access would not be impeded.

(continued on page 32)

Below: Mati Waiya blesses the Ormond Beach restoration area.



PUBLIC SCOPING MEETING
DESERT SOUTHWEST TRANSMISSION LINE PROJECT
IMPERIAL IRRIGATION DISTRICT

Name _____
Address _____ Harriet Allen
3750 El Canto Drive
Spring Valley, CA 91977
Phone Number 619-670-7127
Comment from Scoping Meeting Sept 11, 2002
117 Headquarters
See attached letter

Please submit your comments at the end of the meeting, by mail or by fax before the end of the comment period, September 15, 2002. Please send your response to:

✓ Michel D. Remington
Imperial Irrigation District
333 East Barioni Blvd.
P.O. Box 937
Imperial, California 92251
Fax Number: (760)482-9896